

*U.S. Department of
Homeland Security*
**United States
Coast Guard**



Guidance for the
Alternate Compliance and Safety
Agreement Program
(ACSA)

Rev. 6 Oct 2010

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Introduction

The guidance in this document is provided to ensure consistency among various Coast Guard units involved in carrying out the Alternate Compliance and Safety Agreement (ACSA) Program. This document addresses the implementation of the voluntary ACSA Program and provides specific instructions regarding recommended safety requirements. The elements in this document, and the specific instructions regarding those elements, are not intended to supplement the exercise of good judgment in implementation of the Program.

Much of the information in this document reiterates information already provided via different venues and correspondence. The ACSA Program governing guidance remains [G-PCV policy letter 06-03](#), dated July 1, 2006. A copy of this document may be downloaded at <http://www.uscg.mil/d13/cfvs/acsa/>. This document is also provided for the benefit of ACSA vessel owners and operators, naval architects, marine surveyors, shipyards and other industry partners. Wide dissemination is encouraged.

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You may propose an alternative approach for complying with these requirements, which may be approved by the District Commander if the proposed alternative satisfies the requirements of applicable statutes and regulations. If you wish to discuss an alternative approach, you may contact Mr. Dan Hardin, (206) 220-7226 or Daniel.E.Hardin@uscg.mil.

This document and [G-PCV policy letter 06-03](#) may call for the "collection of information" as defined in the Paperwork Reduction Act of 1995, 44 U.S.C. 3501 et seq. To the extent such a collection has not been approved by the Director of the Office of Management and Budget (OMB) and does not display a valid control number assigned by the Director, no person shall be subject to any penalty for failing to comply with the collection of information. We anticipate initiating an information collection request for any such collection of information as part of an upcoming rulemaking project.

Points of Contact

Questions

Questions concerning the ACSA Program should be directed to the Thirteenth Coast Guard District Commercial Fishing Vessel Safety ACSA Program Coordinator , Mr. Troy Rentz (206) 220-7216 (troy.rentz@uscg.mil).

Examinations

Examinations may be requested from the Coast Guard Sector Command nearest the location at which the vessel will be examined.

Sector Seattle

Mr. Paul Tramm (206) 217-6896

Sector Anchorage

Mr. Ed Miner (907) 271-6945

Marine Safety Detachment Dutch Harbor

(907) 581-3466

Marine Safety Detachment Kodiak

(907) 486-5918

Adequate notice for scheduling purposes and travel should be provided depending upon distance from the Coast Guard office and the vessel.

Unscheduled examinations such as emergency dry-docking should be relayed to the appropriate office at the first opportunity.

History of the Alternate Compliance and Safety Agreement

The Bering Sea/Aleutian Island (BSAI) and Gulf of Alaska (GOA) freezer longliner and freezer trawler fleet, referred to as the H&G Fleet, occupy a unique niche in the North Pacific fishing industry. Unlike other catcher vessels which deliver fish in the round to shore plants, H&G vessels catch, sort, head, eviscerate, clean, and prepare fish into various fish products on board the vessel. These products are then frozen, packaged, and stored on board until offloaded. Vessels in the H&G Fleet have historically been regulated as “fishing vessels” as opposed to “fish processing vessels.”

Formal Coast Guard investigations into the losses of the F/Vs ARCTIC ROSE and FPV GALAXY, and subsequent analysis of the H&G fishing fleet found that nearly 100% of the vessels in this fleet are not operating as fishing vessels but instead are operating as fish processing vessels.

In terms of vessel safety requirements, the [Commercial Fishing Industry Vessel Safety Act of 1988 \(P.L. 100-424\)](#) and the implementing regulations found in [46 CFR Part 28](#) make significant distinctions between fishing vessels and fish processing vessels. The requirements for fish processing vessels are much more stringent than those required for fishing vessels.

Specifically, non-grandfathered fish processing vessels are required by [46 CFR 28.710](#) and [46 CFR 28.720](#) to be classed by the American Bureau of Shipping, or a similarly qualified organization, and to be examined at least once in every two years for compliance with applicable regulations. Additionally, 46 CFR Subchapter E—Load Lines applies to fish processing vessels over 79 feet in length.

The Coast Guard believes that a strict interpretation of the fish processing vessel definition serves safety, and is consistent with both the law and Congressional intent. In making a final determination of what products are considered to be fish processing, the Coast Guard has utilized the standardized descriptions from the National Marine Fishery Service Product Codes (50 CFR, Part 679, Table 1). [See Annex 1 – Product Codes.](#)

Due to age restrictions imposed by the American Bureau of Shipping and Det Norske Veritas classification societies, nearly 70% of the H&G Fleet will not be accepted for classification. Thus these vessels cannot come into compliance with the existing regulatory framework for fish processing vessels. The regulations in [46 CFR 28.720](#) do not provide an alternative for the operator of a fish processing vessel that cannot be classed; however under [46 CFR 28.60](#), such a vessel may request an exemption letter.

Contrary to conventional wisdom, strict enforcement of the requirements for classification and Load Line would not improve safety because it is estimated that 40 H&G vessels with 1200 fishermen on board would simply change the amount of processing they do on board to operate as uninspected fishing vessels, subject to minimal safety requirements. The ACSA Program was developed in 2006 to process individual requests for exemption letters under [46 CFR 28.60](#). The Program allows exemptions to the class and Load Line requirements while at the same time providing an equivalent

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level of safety for these vessels by improving safety requirements for these vessels, thereby avoiding the incentive to operate strictly as uninspected fishing vessels. The Coast Guard has continually supported legislation that would improve the safety of the commercial fishing industry by subjecting all commercial fishing industry vessels to a mandatory inspection regime. Until such a regime is enacted, programs similar to the ACSA may be necessary to provide an equivalent level of safety for commercial fishing industry vessels. The hallmark of this Program is the approach of working closely with industry stakeholders in developing elements of this alternate and voluntary program in order to save lives. The Coast Guard will continue to exercise an aggressive leadership role in this Program while consulting with the H&G Fleet stakeholders to honor their significant commitment to date.

Because the H&G Fleet operates in both the Thirteenth and Seventeenth District areas of operations, the ACSA Program has been developed with the concurrence of both District Commanders. Success of the ACSA Program depends upon a high level of coordination between these Districts, Sector Seattle, and Sector Anchorage.

This Program has been praised by all involved. It is a success story for the Coast Guard and for the H&G Fleet. Implementation of the Program has improved safety immeasurably for the H&G Fleet. Nonetheless, initial implementation of the Program, the sinking of the F/P ALASKA RANGER March 23, 2008, and lessons learned from initial implementations have caused a reexamination of the Program. While there are successes resulting from ACSA Program implementation, there are also now a sufficient number of lessons to be learned from initial implementation and the Marine Board of Investigation of the sinking of the ALASKA RANGER. This necessitates evolution of the Program.

The creation of the Program is documented in a number of separate documents

1. Commandant [G-PCV Policy Letter 06-03](#), dated July 1, 2006
2. [D13 Instruction 16710.1](#) dated Jun 15, 2006
3. [D13/D17 Whitepaper \(“Statement of Mutual Support and Cooperation”\) dated June 15, 2006](#) – Alternative Compliance and Safety Agreement (ACSA) for the Bering Sea/Aleutian Island and Gulf of Alaska Freezer Longliner and Freezer Trawler Fishing Fleets.

Who is covered by ACSA?

Definitions

Fish Processing Vessel: The law ([46 U.S.C. 2101\(11b\)](#)) defines a fish processing vessel as “a vessel that commercially prepares fish or fish products other than by gutting, decapitating, gilling, skinning, shucking, icing, freezing, or brine chilling.” Coast Guard policy (MVI Policy Letter 14/90 dated June 20, 1990, file 16710) has consistently been to support an aggressive interpretation of what activities justify determining that a vessel is operating as a fish processing vessel. [Annex 1](#) lists the activities determined to constitute fish processing and vessels engaged in those activities are fish processing vessels.

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Fishing Vessel: The law ([46 U.S.C. 2101\(11a\)](#)) defines a fishing vessel as “a vessel that commercially engages in the catching, taking, or harvesting of fish or an activity that can reasonably be expected to result in the catching, taking, or harvesting of fish.” [Annex 1](#) also lists the activities determined not to be fish processing. Based upon this, a vessel which produces only those fish products identified as “H&G” in [Annex 1](#) is considered to be a fishing vessel.

Applicability

The ACSA Program was developed for those approximately 64 fish processing vessels, historically known as the H&G Fleet. Applicability of certain provisions of law, regulations, and the ACSA Program are dependent upon several considerations as explained below. This Program is available to all H&G Fleet vessels, and although fishing vessels are not subject to the same legal requirements as fish processing vessels and do not need an exemption from those legal requirements, the Program is available and encouraged for fishing vessels for the safety benefits. To ensure the safety benefits of the Program, an operator of a vessel who desires to have the vessel enrolled should comply with the specific Program elements, as explained below.

Applicability Checklist

1. To be accepted into the Alternate Compliance and Safety Agreement (ACSA) Program select one of the following:

- Vessel is classed and loadlined, Vessels with a valid Certificate of Class, Loadline Certificate and Certificate of Compliance as a fish processing vessel do not need to enroll in the ACSA program.
- Vessel is grandfathered, vessel has operated without major conversion as a fish processing vessel since before July 27th 1990, vessel does not need to be classed or loadlined. Vessel does need a Certificate of Compliance as a fish processing vessel.
- Vessel is not classed but does have a loadline, the vessel should provide a stability book in compliance with section B of this document.
 - Provide a valid copy of the loadline certificate.
 - Have a valid Certificate of Compliance as a fish processing vessel.
 - Complete sections G-L of this document.
- Vessel is not classed and not loadlined, this vessel should:
 - Provide a stability book in compliance with section B of this document.
 - Have a valid COC as a fish processing vessel. Complete sections A-L of this document.

Applicability Discussion

Existing or new fishing vessels that only produce those fish products identified as “H&G” in [Annex 1 – Product Codes](#), do not need to enroll in the ACSA Program. Enrollment is encouraged because of the safety benefits.

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Existing Fish Processing Vessels

Existing fish processing vessels that produce one or more of the nine fish products identified as “Beyond Minimal Processing” in [Annex 1 – Product Codes](#), have several options:

Become classed and loadlined;
Enroll in the ACSA Program; or
Revert to production of H&G products only.

Not Classed, No Load Line Certificate

A vessel that is not classed and has no Load Line Certificate and enrolls in the ACSA Program should meet Sections (A-L) of this document to continue operating as a fish processing vessel producing products listed in [Annex 1 as “Beyond Minimal Processing.”](#)

Load Line Certificate, Not Classed

A vessel that is not classed, but has a valid Load Line Certificate, should meet Sections (G-L) of this document. These vessels should maintain Load Line Certificates in addition to receiving a letter of exemption of classification requirements from the District Commander under the ACSA Program to continue operation as a fish processing vessel producing products listed in [Annex 1 as “Beyond Minimal Processing.”](#)

Grandfathered Fish Processing Vessels

A fish processing vessel that meets the ‘grandfathered’ provisions explained in [Annex 3](#) is not subject to the requirements for a Load Line Certificate or classification as required by 46 CFR Part 28 Subpart F. Such vessels need not enroll in the ACSA Program, although they are encouraged to do so. Vessels that meet the grandfathering provisions may continue to process fish without restriction.

Load Lined and Classed

Vessels which are both classed and load lined do not need to enroll in the ACSA Program. There are no limitations on processing for these vessels.

New Fish Processing Vessels

A vessel built or converted for use as a fish processing vessel after January 1, 2006, which produces one or more of the products identified as "Beyond Minimal Processing" in Annex 1, must be classed and loadlined as required by existing laws and regulations. On a case by case basis, an owner may apply for an exemption from class and loadline in accordance with 46 CFR 28.60 and 46 USC 5108 (a)(1). Exemptions are not automatic. Vessel owners requesting an exemption may not produce those products until such time as the exemption has been granted (if granted at all) and the vessel is in full compliance with the conditions of the exemption.

Safety Considerations

Both 46 CFR 28.60 and 46 U.S.C. § 5108 (a)(2) state that exemptions may be granted by the District Commander, *provided that good cause exists for the exemption and that the safety of the vessel and those on board will not be adversely affected*. Consequently, the District Commander may exempt a fish processing vessel from the provisions for vessel classification as described in [46 CFR 28.720](#).

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The regulations, 46 CFR Subchapter E – Load Lines also apply to fish processing vessels. The regulations for load lines are separate from those requiring classification. The same parties have been delegated authority to issue Load Line Certificates on behalf of the Coast Guard. Load Line Certificates may be issued to vessels regardless of classification status. The latitude in granting exemptions in [46 CFR 28.60](#) does not extend to load lines. However, exemption may be granted as authorized by [46 U.S.C. 5108\(a\)](#) as explained in [Annex 4](#). The Coast Guard chose to take advantage of this provision for the H&G Fleet in order to shape a program specific to the H&G Fleet. Commandant CG-5 has determined that vessels in compliance with the ACSA Program demonstrate a level of safety appropriate for this fleet when all Program elements are met.

The safety of the H&G Fleet, with over 1200 persons aboard these vessels, is of utmost importance to the Coast Guard. The H&G Fleet operates in highly regulated fisheries managed by the North Pacific Fisheries Management Council overseen by the National Marine Fisheries Service of the National Oceanic and Atmospheric Administration. The Coast Guard has no desire to disrupt existing NMFS fishery management plans that concentrate primarily on ensuring sustainable fisheries. Therefore, working in consultation with H&G Fleet representatives, the ACSA Program was developed.

American Bureau of Shipping (ABS) rules for classification and Coast Guard load line regulations are respectively a fundamental vessel construction code and a technique to confine vessel loading within structurally safe boundaries and recognized stability limits. Vessels considered for the ACSA Program have an extensive operating history.

Vessels with the H&G Fleet have a proven record of satisfactory service for basic hull, machinery, and service systems. If anything, casualty records indicate errors and omissions in maintenance and/or management of installed watertight closing devices and vessel loading practices are most consistently related to vessel losses. These are principally load line and vessel stability issues.

ACSA requires that vessels without a loadline provide Stability Instructions to specify the location of a loading mark on each side of the hull. These loading marks are determined by the greatest freeboard required by the stability criteria for the “worst” loading condition. In addition, the Stability Addendum provides the Coast Guard and the owner specific guidance to ensure that necessary watertight integrity is maintained.

The importance of periodic examinations by an outside authority, which is an integral part of both classification and load line regulations, however, cannot be overlooked. These premises as well as significant issues identified in recent casualties have been considered in the development of these proposed requirements. For enrollment in the ACSA Program, operators voluntarily agree to comply with appropriate safety standards which will improve watertight integrity, vessel stability, fire prevention, machinery maintenance, lifesaving equipment usage, and crew member training. The Coast Guard has gone to great lengths to develop a regime that will provide a level of safety appropriate for the H&G Fleet. While ACSA Program elements differ from the

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requirements of classification and Load Lines, many provisions of the Program rely on and in many cases approximate those standards.

ACSA Examination Requirements

Four examination types performed on ACSA vessels:

"Renewal Examination" accomplished at the beginning of the exemption period and the issuance of the ACSA Exemption Letter. Must be completed prior to the expiration of the previous ACSA Exemption Letter. During this examination the vessel is examined for the requirements listed in Sections A, B and F - L of the ACSA Implementation Guidance. The request for renewal must be made by the owner or operator to the Thirteenth District Commander 60 days prior to the expiration of the vessels previous exemption letter.

"Mid-Period Examination" required one year after the **"Renewal Examination"**. The owner is allowed 60 days either side of the one year anniversary. This examination also includes a check of the same Sections A, B and F - L listed in the ACSA Implementation Guidance. (See Section A in the "Discussion" Section and [Annex 2](#)).

Emergency drills as required by [46 CFR 28.270](#) and [Sec K](#) of this document, will be a part of the ACSA Annual and Mid Period exams and must be performed to the satisfaction of the attending Marine Inspector, so long as that person is a Coast Guard approved drill conductor.

"Dry-dock Examination" is required twice in a five year period, with no interval allowed to exceed 3 years. This examination includes a check of requirements listed in Sections C - G of the ACSA Implementation Guidance.

"Certificate of Compliance (COC)" is the Dockside Safety Exam to ensure the vessel is in compliance with all commercial fishing vessel and other safety regulations. This examination must be done annually and not be allowed to expire. A Commercial Fishing Vessel Decal is issued at the time of this examination. The examination includes applicable items listed in the [CFIVS Exam Book \(CG-5587\)](#) and it's [supplement \(CG-5587B\)](#), or an equivalent District or Sector developed dockside examination form.

ACSA Examination preparations

It is recommended that the vessel's crew go through the ACSA examination checklist prior to the examinations to ensure all equipment is in good working condition and to round up all required documents.

Correction of Deficiencies & Enforcement

Following entry into the ACSA Program, a participating vessel found to be out of compliance with the provisions of the Program will be directed to correct any deficiencies in a timely manner as determined by the OCMI. Failure to correct these deficiencies may result in disenrollment from the ACSA Program, or an appropriate prohibition from producing any fish products listed in [Annex 1](#) as **"Beyond Minimal Processing."** The goal of the ACSA Program is to provide a reasonable amount of time

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for vessels to come into compliance with the ACSA standards. However, nothing in this agreement shall limit the OCMI from requiring a vessel owner to correct a deficiency immediately if, in the opinion of the Coast Guard, such a condition is determined to be especially hazardous to the crew, vessel, or the environment.

As vessels are progressing toward full initial ACSA compliance, all deficiencies are to be captured on a worklist. Once a vessel is issued an exemption letter, any future deficiencies will be documented with an ACSA Deficiency Report (akin to the CG-835). An appropriate compliance date will be assigned, and details documented in MISLE as a deficiency.

Appeals

Owners have the right to appeal the decision of the attending Marine Inspector to the OCMI for that zone. In accordance with [46 CFR 1.03-20](#), owners have the right to appeal the decision of the OCMI to the District Commander. In accordance with [46 CFR 1.03-25](#), owners also have the right to continue to appeal the decision of the District Commander to Commandant CG 543.

Annual Meetings

On an annual basis, District 13 (dp) shall coordinate with District 17 (dp) to meet with Commandant CG-5433, industry representatives, and owners and operators to evaluate the effectiveness of the ACSA Program.

Modifications to the ACSA Examination Standards

It is anticipated that the extensive examination of vessels will identify safety issues needing to be addressed in the ACSA Program. Changes and adaptations to the ACSA standards may be made so long as the ACSA standards continue to provide an appropriate level of safety.

Proposed changes to the ACSA examinations standards will normally be presented at the annual meeting of ACSA stakeholders for discussion. Proposed changes will be provided in writing at least 60 days prior to the meeting. All stakeholders will have 30 days after the meeting to provide a written response to the 13th District Commander.

In certain urgent cases, changes to the ACSA examination requirements may not be held for discussion at the annual ACSA meeting. The Coast Guard will send a notice of proposed changes via e-mail to all ACSA stakeholders for comment. All stakeholders will have 30 days to provide a written response to the 13th District Commander. The District Commander will schedule a meeting for the purposes of public comment as needed.

It is possible that immediate changes, required by Commandant, may occur as the result of casualty investigations, and there may not be opportunity for comments from stakeholders.

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Lessons learned are inevitable and all parties should recognize the benefits of revisiting ACSA Program requirements.

A [summary of modifications](#) will record changes to the ACSA examination standards.

Updates to the Fish Product Guide

Annex 1 was developed for the Head and Gut Fleet and is not all inclusive. As industry practices change, or should questions arise, the District Commander will evaluate the operation for a determination and forward a recommendation to Commandant for determination.

References

ACSA Guidance

ACSA guidance documents are updated and maintained electronically. They are easily accessed by going to <http://www.fishsafe.info/> or <http://www.uscg.mil/d13/cfvs/acsa/>

This guidance incorporates a CG-840 style book of checklist items with explanations of requirements, references for further detail, and other amplifying information.

ABS Rules

References made to the ABS Rules for Building and Classing Steel Vessel Under 90 meters are as per the 2009 edition. Access to the ABS rules can be accomplished by going to the ABS web site www.eagle.org, select “Resources” > “Rules and Guides” > “Downloads” > “ABS Rules for Building and Classing Steel Vessel Under 90 meters”. Access to the rules is free after completing the registration form online.

Other references

All references are as promulgated as of June 2009 unless otherwise noted in this document. An electronic version of this document is available with active hyperlinks for each reference. References are those in affect as of June 2009. Electronic copies of the document with references can be obtained by contacting the 13th Coast Guard District Office.

Roles within the ACSA program

Coast Guard Role in ACSA Compliance

It is the Coast Guard's aim to provide a high degree of engagement with and oversight of the ACSA Program until such time that the Program is fully established and is functioning at a high level. As such, the Coast Guard will assume the lead for compliance with the ACSA provisions. The Thirteenth and Seventeenth Coast Guard District Commanders will provide uniform compliance and oversight with Sections (A)-(L) of this document. Full compliance with the ACSA will be achieved when a letter of exemption is issued by the appropriate District Commander allowing an existing H&G Fleet vessel to operate as fish processing vessel.

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13th and 17th Coast Guard Districts

The 13th and 17th Coast Guard Districts will jointly develop policies and procedures, share information and provide expertise in support of the ACSA program.

The 13th and 17th Coast Guard Districts shall ensure substantial compliance with ACSA guidelines prior to granting exemptions. Upon final review and approval by the 13th or 17th Coast Guard District, an exemption letter detailing the conditions of the renewable exemptions from classification and loadline will be sent to the vessel owner, allowing an H&G Fleet vessel to operate as a fish processing vessel producing products listed in Annex 1 as “Beyond Minimal Processing.”

Coast Guard Sectors Seattle and Anchorage

Sector Seattle will act as the central repository of vessel plans, files and other records. In addition, documents such as stability books, stability addendums, deadweight surveys, deficiencies, and loadline certificates will be electronically scanned and added to a vessel’s MISLE (Marine Information for Safety and Law Enforcement) record.

Vessel representatives can schedule a visit with the local Sector to review the vessel’s records.

ACSA Examination Personnel

It is expected that Coast Guard personnel engaged in ACSA examination activities will act within the scope of their qualifications. Items required by [46 CFR Part 28](#), Subparts B and C may be completed by qualified CFVS Examiners. Drill compliance in Section (K) can be verified by a Marine Inspector or CFVS Examiner who has completed a Coast Guard Approved Drill Conductor class. Sections (A) through (J), and (L) are to be completed to the satisfaction of the attending Marine Inspector acting within the authority of his or her qualifications.

ACSA inspectors shall endeavor to enter examination results and narratives in MISLE within two weeks of the activity, or sooner if necessitated by the vessel’s movement to another OCMI zone.

Role of Approved Third Party Organizations

Representatives of third party organizations can conduct the required annual Certificate of Compliance examination. [Annex 2](#) provides a guide on who may perform verification tasks as part of the ACSA Program.

Role of ACSA Vessel Owners and Operators

ACSA vessel owners and operators will request exemptions from the Thirteenth Coast Guard District and schedule ASCA examinations outlined below.

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Requesting an ACSA Exemption Letter

The operator of a vessel in the H&G Fleet has the burden of applying for an exemption under [46 CFR 28.60](#) and justifying the manner in which “*the safety of the vessel and those on board will not be adversely affected.*”

Owners/operators who request an exemption under the ACSA Program are admittedly not fully in compliance with [46 CFR Part 28](#) and 46 CFR Subchapter E until a final exemption letter under [46 CFR 28.60](#) is issued. To clarify vessel status while in pursuit of exemptions discussed in the ACSA Program and to memorialize the owner’s/operator’s commitment to the ACSA Program, a letter stating the terms and conditions of continued vessel operations will be issued by the appropriate District Commander for each vessel at the earliest opportunity after the vessel enters the Program.

Request for renewal of the ACSA Exemption Letter

A request to remain in the ACSA Program for re-issuance of a new ACSA Exemption Letter must be made 60 days prior to the expiration date listed in the body of the ACSA Exemption Letter. Renewal examinations may be done prior to the expiration date but cannot exceed the expiration date. Request for renewal letters must include the operator’s written consent to permit Coast Guard Marine Inspectors aboard for initial, mid-period, and dry-dock examinations to ensure continued compliance with exemption letter requirements. The renewal letter should state that the vessel continues to remain in compliance with the ACSA Implementation Guidance. See example request for renewal letter in [Annex 4](#).

District Commanders will consider each application on a vessel-by-vessel basis. The unique design, vessel history, operational features, and experience in the ACSA Program of each vessel will be considered. Additionally, at the District Commander’s discretion, the safety history of the vessel before and after enrollment should be considered prior to re-enrollment into the program.

Revocation of an exemption letter

At any time the Coast Guard discovers that a vessel previously granted an exemption is not in compliance with the letter, the District Commander may, on a case-by-case basis, either disenroll the vessel from the ACSA Program or prohibit the vessel by an appropriate operational control from producing any products listed in Annex 1 as “Beyond Minimal Processing.” Commandant CG-5433 must be notified by message in all such cases. Vessels failing to complete the required mid-period examinations or required dry-dock examinations on time are examples of non-compliance with the ACSA requirements.

Appeals: In accordance with [46 CFR 1.03-25](#), owners have the right to appeal the decision of the District Commander to Commandant CG 543.

Section B - Stability

B - Vessel Stability	Interval	References
<ul style="list-style-type: none"> ○ 1. Stability Instructions <ul style="list-style-type: none"> ❑ Not greater than 5 years since last inclining or verification of stability by deadweight survey. ❑ Examine loading marks located on side of vessel to ensure they match the locations as described in the stability instructions. ❑ Examine instructional addendum to stability instruction to ensure it describes each of the following: <ul style="list-style-type: none"> — Watertight bulkheads — Watertight closures (identification, location, size & type) — Weather-tight closures (identification, location, size & type) — Coamings and vents (heights and locations) — Automatic closure devices and operating stations for doors, hatches, scuttles, chutes, tank vents — Ventilation devices located on the main deck or above — Sea valve location, size, type and remote operators — Hull freeboard — Underwater body ❑ Factory Sump Pumps <ul style="list-style-type: none"> — Examine calculations to ensure sufficient capacity on each side of the factory; equals or exceeds the maximum inflow rate as determined by a naval architect. — If no sump pumps are used because freeing ports and /or scuppers are used, this must be listed in the stability addendum. — Addendum must list size and number of freeing ports and drain lines. 	<p>Annually</p> <p>Annually</p> <p>Annually</p> <p>Annually</p>	<p>46 CFR 28.530</p> <p>Original ACSA Agreement B 1</p> <p>B 2(b)</p> <p>B2(d)</p> <p>B 2(c)</p> <p>ABS LL-11D</p>

Discussion

Stability

The requirements of [46 CFR Part 28 Subpart E--Stability](#) are applicable, regardless of enrollment in the ACSA Program. Depending upon the date of any vessel modifications or major conversion, the requirements of [46 CFR 28.530](#) may apply. Each application for exemption under [46 CFR Part 28.60](#) should present a history of the vessel's modifications and/or major conversions.

Lightweight Determination

Upon entering the ACSA Program, the vessel will have lightweight determined in accordance with [46 CFR 28.535](#). At each five (5) year anniversary of the inclining experiment, a new inclining experiment and up-to-date stability instructions will be required, unless the validity of existing data and stability instructions can be verified by deadweight survey and examinations in compliance with [46 CFR 28.501\(c\) and \(d\)](#).

Stability Instructions

Each vessel will have on board current Stability Instructions complying with [46 CFR 28.530](#). Stability Instructions will identify the location of a maximum draft mark to be located at the vessel's mid-length and identify departure conditions to be checked prior to departure.

Stability Addendum

An addendum to the above Stability Instructions shall be prepared, and will include:

1. A list of all watertight bulkheads in the hull structure including size and type of watertight closures in each such bulkhead.
2. A tabulation of all weather-tight closures: doors, hatches, scuttles, chutes, tank vents, and ventilation devices main deck or above. Each will be identified by type, size and location annotated to identify any automatic closure devices and operating stations. Coamings and vent heights will be identified. Alternately, this information may be presented on deck plans and elevations. Marine Inspectors shall check the master's familiarity with the stability addendum
3. Tabulation of through-hull fittings including location, size, type, and remote operators, if any.

Processing space sump pumps

The Coast Guard recognizes that a primary ingredient in processing fish is sea water used to move the fish throughout the processing space. Introduction of water below decks can become a stability problem if not controlled adequately. In factory spaces where water is used and can accumulate, Factory Sump Pumps are required. The capacity of the Sump Pumps on each side of the vessel must be capable of dewatering at the rate of water introduced into the factory space. Calculations must be developed as part of the stability review process to ensure adequate dewatering capacity, and included in the Addendum.

The operator of a vessel with unique arrangements that provide an equivalent level of safety and meet the intent of this requirement should include an explanation in their request for an exemption under [46 CFR 28.60](#).

If no sump pumps are used (e.g. freeing ports and/or scuppers only), this shall be identified in the Addendum, and information shall be provided as to the number and size of the freeing ports or drain lines. Any changes, alterations or additions made to any of the items listed in the stability addendum must be approved through the naval architect who issued the stability instructions and must be brought to the attention of the local OCMI.

Record Keeping

Copies of Stability Instructions (including Addendums) and Inclining/Deadweight Survey will be submitted to Sector Seattle as the custodian of vessel files.

Section C – Dry-docking and internal structural exams

C - Drydock and Internal Structural Exam	Interval	References
<ul style="list-style-type: none"> ○ 1. Propeller(s) ○ 2. Stern bushing(s) ○ 3. Sea connections 	Twice in 5 years not to exceed a 3 year interval	46 CFR 61.20-5(a)
○ 4. Weldments. Visually examine condition of all welds for (1)Washed out welds, (2)Cracking, (3)Excess pitting/corrosion		NVIC 7-68
○ 5. Shell plating: Visually exam condition of all shell plating		
<ul style="list-style-type: none"> ○ 6. Sea chests <ul style="list-style-type: none"> ❑ Open for examination ❑ Check all welds, plating and thru -hull penetrations 	5 yrs	46 CFR61.20-5
<ul style="list-style-type: none"> ○ 7. Sea valves <ul style="list-style-type: none"> ❑ All valves within 6 inches and below of the deepest load waterline must be opened for examination and examined: (1) Seats (2) Guides (3) Body (4) Stem ❑ Valves must be located as close as possible to the side shell plating ❑ Valves are to be steel, bronze or other approved material. Valves of ordinary cast iron are not acceptable. ❑ Valves employing resilient material to seal must be "Category A". ❑ If butterfly valves are used, they must be of the lug type. ❑ Wafer-type valves are not acceptable. 	5 yrs	ABS rules 4-4-2/19
○ 8. Sea Strainers. Open for examination and clean	5 yrs	46CFR61.20-5(b)
○ 9. Valves for emergency bilge suction (if equipped), open for examination & examined	5 yrs	46 CFR91.43-1
<ul style="list-style-type: none"> ○ 10. Internal Examination of Integral Fuel Oil Tanks see 46CFR91.43-1 to determine the number of tanks that must be opened for examination. <ul style="list-style-type: none"> ❑ Examine all for wastage /damage of (1) All side shell, bulkhead and tank top plating (2) Frames (3) Welds 	Twice in 5 years	46 CFR91.43-1
<ul style="list-style-type: none"> ○ 11. Examination of internal spaces/voids/cofferdams/ballast tanks (see 46CFR91.43-1 for number of tanks that must be opened for examination) <ul style="list-style-type: none"> ❑ All side shell, bulkhead and tank top plating, frames and welds 	5 yrs	46CFR 91.43-1 91.40-3a

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<p>○ 12. Hull Markings: Fore and aft draft marks. Maximum loading mark location in terms of mid-length location by frame number and distance in inches from the molded main deck line to the bottom mark as identified in the addendum to the stability letter.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Mark 12 inches long, 1 inch wide <input type="checkbox"/> Horizontal white line centered on listed location <input type="checkbox"/> Located port and starboard sides <input type="checkbox"/> Permanently marked by weld bead or punch marks 	<p>Twice in 5 years not to exceed a 3 year interval</p>	<p>46CFR 97.40-10 Original ACSA Agreement</p>
<p>○ 13. Hull Repairs</p> <ul style="list-style-type: none"> <input type="checkbox"/> When repairs are required to the underwater body, framing or other structural members, the cognizant OCMI must be notified. Guidance for repairs should be in accordance with Navigation and Vessel Inspection Circular (NVIC 7-68) & good marine practice. 	<p>When required</p>	<p>MSM Vol. II Ch B3.B2 NVIC 7-68</p>
<p>○ 14. Ground Tackle</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ensure suitable for vessel <input type="checkbox"/> Anchors and chain / wire rope are to be ranged <input type="checkbox"/> Operational test of windless <input type="checkbox"/> Chain to be gauged; Maximum wastage allowed is 12% 	<p>5 yrs</p>	<p>ABS Rules Part 2, Chap. 2</p>
<p>○ 15. Vital System Piping (essential to safety of the vessel and crew)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Must meet minimums in 46 CFR Subchapter F <ul style="list-style-type: none"> — Fuel oil for main propulsion / emergency generators — Lubricating oil systems — Cooling water for main propulsion / emergency generators — Bilge and ballast systems — Steam systems — Starting and control air systems (7) Fire main and firefighting systems <input type="checkbox"/> Materials must be as specified in subpart 46CFR56.60 <input type="checkbox"/> Welding must be with approved procedures using certified welders. <p>Exemption: existing systems can remain unless the piping is declared manifestly unsafe or piping is being repaired/replaced.</p>	<p>Annually</p>	<p>46CFR 56.07-5(f) 56.50-1 56.50-60 56.50-80 56.50-95 56.50-57 56.50-15 56.70</p>

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<ul style="list-style-type: none"> ○ 16. Non-metal expansion joints <ul style="list-style-type: none"> ❑ External Examination. Inspect for excessive wear, fatigue, deterioration, damage, misalignment, improper flange to flange spacing, and leakage ❑ Internal examination must be conducted when external examination reveals excessive wear or other signs of deterioration or damage 	<p>Annually</p> <p>When req Min 10 yr</p>	<p>46 CFR 61.15-12</p>
<ul style="list-style-type: none"> ○ 17. Pressure Vessels (Compressed air receivers - greater than 5 cf) <ul style="list-style-type: none"> ❑ Internal and external examination ❑ Hydrostatic testing unless examined internally by a marine inspector & no defects found which would impair the safety of the pressure vessel ❑ Pressure Relief Valves pressure tested: <ul style="list-style-type: none"> — Set to relieve at or below 10% above MAWP — Upper range on gages not less than 1.2X or more than 2X the relief valve setting. 	<p>5 yrs 5 yrs</p> <p>Twice in 5 yrs not to exceed a 3 yr interval</p>	<p>46 CFR 61.10-5</p> <p>54.15-5</p>

Discussion

Dry Dock Examinations

Each vessel will be dry-docked and an internal structural examination (ISE) conducted a minimum of 2 times in any 5 year period with a maximum interval of 3 years.

Owners will notify the local OCMI 30 days in advance of all scheduled dry-dockings, and as soon as possible for unplanned dry-dockings.

When any vessel is dry-docked and an ISE conducted under this agreement, a Coast Guard Marine Inspector, shall examine the hull, internal structure, propeller, stern bushing, sea connections and fastenings.

Sea chests, sea valves, sea strainers, and valves for the emergency bilge suction shall be opened up for examination every alternate dry-docking under this agreement.

Hull Markings

1. Fore and aft draft marks shall be provided.
2. The loading mark amidship shall be examined as described in [B.1.b.](#) The mark will be a horizontal white line 12 inches long, one inch wide, and centered on the listed location. The line will be permanently outlined port and starboard by weld bead or punch marks.

Repairs

Where guidance is needed for repairs to hull, framing, and other structural members, existing requirements for inspected vessels, i.e., Navigation and Vessel Inspection Circular ([NVIC](#) 7-68), and principles of good marine practice apply.

Ground Tackle

The anchors and chain are to be ranged, examined and the required complement and condition confirmed. The chain locker, holdfasts, hawse pipes, chain stoppers and anchor windless are to be examined and pumping arrangements of the chain locker operationally tested. Installed anchoring systems that do not meet the ABS standard are acceptable (grandfathered) until they no longer function or have deteriorated beyond a reasonable standard. When a grandfathered anchoring system is replaced (rather than just repaired), the new anchoring system must meet ABS standards.

Chains are to be gauged and renewed in cases where their mean diameter is 12% or more below the original required nominal size.

Vital piping systems

Vital systems are those systems necessary for the safe operation of the vessel and for dealing with emergency situations. These systems include but may not be limited to:

- All steam piping;
- All fuel oil piping and tubing;
- Main engine and generator lube oil system piping and tubing;
- Main engine and generator cooling water piping;
- Starting and control air system piping and tubing;
- Fire main and fire fighting system piping and tubing; and,
- Bilge, ballast, and dewatering system piping.

Section D – Tail shaft & rudder exams

D - Tail Shaft and Rudder Examinations	Interval	References
<ul style="list-style-type: none"> ○ 1. Each tail shaft must be drawn and visually inspected as follows <ul style="list-style-type: none"> ❑ Multiple shafts. ❑ Tail shafts with inaccessible portions must be fabricated of materials resistant to corrosion by sea water, <u>or</u> fitted with a continuous liner, <u>or</u> a sealing gland which prevents sea water from contacting the shaft. 	<p>5 yrs</p> <p>5 yrs</p>	<p>46 CFR 61.20-18</p> <p>61.20-17(c)</p> <p>61.20-17(d)</p>
<ul style="list-style-type: none"> ❑ Tail shafts with oil lubricated bearings <i>need not be pulled</i> as long as each of the following is done: <ul style="list-style-type: none"> — tail shaft readings — inboard seal assemblies examined — analysis of tail shaft oil lubricant in accordance with manufacturer's recommendations to determine: <ul style="list-style-type: none"> · max bearing material content, presence of other contaminants — NDT tapered tail shaft and keyway in place (if fitted) — NDT coupling bolts and flange for props with coupling in place (if fitted) 	<p>Every DDX</p> <p>Min 6 months</p> <p>5 yrs When removed</p>	<p>61.20-17(e)</p> <p>61.20-17(e)(4)(i)</p>
<ul style="list-style-type: none"> ❑ Tail shafts – All others 	<p>Twice in 5 yrs not to exceed a 3 yr interval</p>	<p>61.20-17(b)</p>
<ul style="list-style-type: none"> ○ 2. Examination requirements for all shafts as applicable <ul style="list-style-type: none"> ❑ Tail shaft with fitted key <ul style="list-style-type: none"> — NDT of forward 1/3 of the shaft's taper section — Visual examination of entire shaft ❑ Tailshaft with a propeller fitted by means of coupling flange <ul style="list-style-type: none"> — NDT coupling flange, fillet at propeller end, coupling bolts — Visual examination of entire shaft 	<p>Twice in 5 yrs not to exceed a 3 yr interval</p>	<p>46 CFR 61.20-18(b)</p> <p>61.20-18(c)</p>
<ul style="list-style-type: none"> ○ 3. Rudder and Rudder Shaft Examination <ul style="list-style-type: none"> ❑ Ensure rudder bearing clearances are within manufacturer's specifications. ❑ Examine: <ul style="list-style-type: none"> — Rudder plating, weldments, water leakage — Rudder stocks, and if fitted with a tapered stock, the keyways, keys and locking nut — Pintles — Gudgeons. — Coupling bolts, if fitted with flange couplings — Rudder supporting structure — skegs, fairwaters/fairings, shoe, pieces, carrier, and anti-lifting devices, if fitted 	<p>Twice in 5 yrs not to exceed a 3 yr interval</p> <p>When removed</p>	<p>ABS Rules Part 3-2-11</p>

ACSA Guidance

Shipping standards to reduce stress concentrations or are fitted with a flanged propeller. Accessible portions of tail shafts must be examined visually during every dry dock examination for credit.

Tail shafts with oil lubricated bearings, including bearings lubricated with a substance considered to be equivalent to oil under paragraph (2) of this section *need not be drawn* for examination--

1. If tail shaft bearing clearance readings are taken whenever the vessel undergoes a dry dock examination or underwater survey;
2. If the inboard seal assemblies are examined whenever the vessel undergoes a dry dock examination or underwater survey;
3. If an analysis of the tail shaft bearing lubricant is performed semiannually in accordance with the lubrication system manufacturer's recommendations to determine bearing material content or the presence of other contaminants; and
4. If for tail shafts with a taper, the propeller is removed and the taper and the keyway (if fitted) are nondestructively tested at intervals not to exceed 5 years; or
5. For tail shafts with a propeller fitted to the shaft by means of a coupling flange, the propeller coupling bolts and flange radius are nondestructively tested whenever they are removed or made accessible in connection with overhaul or repairs.

Additional Tail Shaft Examination Requirements

On tail shafts with a taper, keyway (if fitted), and propeller designed in accordance with American Bureau of Shipping standards to reduce stress concentrations, the forward 1/3 of the shaft's taper section must be nondestructively tested in addition to a visual examination of the entire shaft.

On tail shafts with a propeller fitted to the shaft by means of a coupling flange, the flange, the fillet at the propeller end, and each coupling bolt must be nondestructively tested in addition to a visual examination of the entire shaft.

Tail Shaft Clearance, Bearing Wear

Water lubricated bearings, other than rubber, must be re-bushed as follows:

1. Where the propelling machinery is located amidship, the after stern tube bearing must be re-bushed when it is worn down to 6.4 mm (0.25 in) clearance for shafts of 229 mm (9 in) or less in diameter, 7.95 mm (0.3125 in) clearance for shafts exceeding 229 mm (9 in) but not exceeding 305 mm (12 in) in diameter, and 9.53 mm (0.375 in) clearance for shafts exceeding 305 mm (12 in) in diameter.
2. Where the propelling machinery is located aft, the after stern tube bearing must be re-bushed when wear is 1.6 mm (.0625 in) less than the applicable clearance for propelling machinery located amidship.

Water lubricated rubber bearings must be re-bushed when any water groove is half the original depth.

Oil lubricated bearings must be re-bushed when deemed necessary by the OCMI. The manufacturer's recommendation shall be considered in making this determination.

Rudder and Rudder Shaft Examinations

Examine:

- rudder plating, weldments, water leakage:
- rudder stocks, and if fitted with a tapered stock, the keyways, keys and locking nut:
- pintles,
- gudgeons,
- coupling bolts, if fitted with flange couplings; and,
- rudder supporting structure, incl. skegs, fairwaters/fairings, shoe pieces, carrier, and anti-lifting devices, if fitted.

Rudder bearing clearances are to be measured and compared to manufacturer's specifications. If specifications for metal bearings are not available, the clearance is not to be less than $d_i/1000 + 0.04$ inches on the diameter, where d_i is the inner diameter of the bushing in inches. For non-metallic bearing material, the bearing clearance is to be specially determined considering the material's swelling and thermal expansion properties, but in no case less than 0.06 inches on diameter.

Strong and effective rudder stops are to be fitted. Where adequate positive stops are provided within the gear, structural stops will not be required.

Suitable means of locking the nuts are to be provided for flange couplings. For a tapered stock coupling, the locking nut is to be fitted with an effective locking device.

Steerable Kort Nozzles and Z Drives

These systems will be handled on a case-by-case basis. Vessels with these systems will submit detailed examination procedures to the OCMI at the time of dry dock.

Section F – Watertight integrity plan

F - Water tight integrity (plan submitted by owner)	Interval	References
<p>○ 1. All watertight/weather tight closures as listed in the stability addendum or ABS LL 11d:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Clearly labeled/identified on-board vessel & correlate to list <input type="checkbox"/> Labeled “Opening authorized for transit only – keep closed at sea” <input type="checkbox"/> All dogs operable <input type="checkbox"/> Chalk or light tested for fit and watertight integrity <input type="checkbox"/> Seal not painted, badly cracked or deteriorated <input type="checkbox"/> Examine sealing edge of closure frame 	Annually	<p>Original ACSA Agreement Section F 1</p> <p>ABS LL-11d</p>
<p>○ 2. All watertight/weather-tight closures listed in stability booklet addendum shall have administrative controls for managing the status as listed below:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Detailed preventive maintenance schedule for each of the closures listed. <input type="checkbox"/> Written instructions for at-sea security watches. <input type="checkbox"/> Each closure listed must include required closure status for at least the following vessel conditions: <ul style="list-style-type: none"> — When the vessel is in transit — When the vessel is actively fishing/processing — When idle on the fishing grounds 	Annually	<p>Original ACSA Section F 2</p>
<p>○ 3. Six-dog "quick acting" watertight closures on aft 1/3 of the main deck and other locations that pose a particular risk to down flooding.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Door coamings minimum of 24 inches in height 	Annually	<p>ACSA Guide Section F Discussion</p>
<p>○ 4. If a particular hazard regarding the status of watertight or weather-tight closures is identified during a vessel survey, an appropriate engineering solution shall be developed by the owner or naval architect, to the satisfaction of the OCMI.</p>	Annually	<p>Original ACSA Agreement Section F 4</p>
<p>○ 5. Factory space high water alarms</p> <ul style="list-style-type: none"> <input type="checkbox"/> Installed in each corner of the factory <input type="checkbox"/> Alarm at water level greater than 6 inches <input type="checkbox"/> Time delay (up to 5 seconds) may be allowed <input type="checkbox"/> Visual alarm <ul style="list-style-type: none"> — Installed in the factory — Installed at the machinery control flat — Installed in the pilot house at piloting station instrument panel <input type="checkbox"/> Distinctive indicator <input type="checkbox"/> Audible alarm in pilot house 	Annually	<p>Original ACSA Agreement Section F5</p>
<p>○ 6. Vents</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ensure vent heights are min 30 inches above the main deck <input type="checkbox"/> Examine condition of closures <input type="checkbox"/> Examine vent balls and seats 	Annually	<p>46 CFR 42.15-50</p>

Discussion

Watertight and Weathertight Closures

All watertight doors through which the vessel crew may pass that are listed in the Stability Instruction Addendum shall be fitted with a sign on both sides reading “Opening authorized for transit only – keep closed at sea.” Similar signs shall be posted at all weather-tight doors to buoyant volume spaces (as identified by Naval Architect).

Administrative controls shall be prepared to manage the status of watertight and weather-tight closures listed in the Stability Instruction Addendum. As a minimum these controls shall include:

1. Detailed preventive maintenance schedule for watertight and weather-tight closures.
2. Written instructions for at-sea security watches detailing periodic monitoring of the status of all watertight and weather-tight closures listed in the Stability Instruction Addendum. Specific notation of required closure status shall be made for at least the following vessel conditions: in transit; actively fishing/processing; or, idle on fishing grounds.

Doors leading to downflooding

The following special requirements apply to weather-tight personnel access doors located on the main deck and opening to the vessel’s interior, in the aft 1/3L of the vessel:

1. Door coamings shall be a minimum of 24 inches in height; and
2. Doors shall be six-dog “quick acting” type; or
3. A “door ajar” alarm (both audio and visual) must be installed at the pilothouse operating station. A delay feature of up to 60 seconds may be installed to avoid interference with vessel operations.
4. If a particular hazard regarding the status of watertight or weather-tight closures is identified during a vessel survey, an appropriate engineering control shall be developed by the owner and/or naval architect, to the satisfaction of the OCMI.

Factory Space High Water Alarm

A factory space high water alarms will be installed near each corner of the factory space to sense water accumulation. The sensors will be positioned to alarm at levels greater than 6 inches deep. Time delays (up to 5 sec.) may be incorporated to prevent false alarm due to surge or splash conditions. A visual alarm shall be installed in the factory and at the machinery space control flat. Both visual and audio indicators shall be installed in the pilot house. The visual and audio alarm in the pilot house will include a distinctive indicator at the normal piloting station instrument panel.

Below deck watertight doors

The importance of maintaining internal subdivision watertight integrity cannot be overemphasized. Should water enter the hull unintentionally, watertight integrity below deck will maintain reserve buoyancy, possibly keeping the vessel afloat. Additionally, maintaining watertight bulkheads in their original design condition can allow time for repairs or dewatering, and protect means of escape. Watertight bulkheads also aid in controlling the spread of fire and products of combustion.

Prior to the first renewal of exemptions under [46 CFR 28.60](#), the OCMI must be satisfied that all reasonable means have been taken by the operator to ensure the original condition of watertight integrity of all bulkheads below the main deck. Vessels built before September 15, 1991 are excepted from the requirements of [46 CFR 28.580](#); however, the intent of the ACSA Program is to maintain and improve existing internal watertight subdivision. The use of Quick Acting Watertight Doors in internal watertight subdivision bulkheads is encouraged, as other types of doors in these bulkheads have proved unreliable as crewmembers tend to not properly close other types of watertight doors. Marine Inspectors will check for, and continue to address, the concerns of other bulkhead penetrations.

Hull Standards of Construction

ABS rules for Building and Classing Steel Vessels Under 90 Meters will be that accepted standard for all issues related to the watertight envelope and subdivision of vessels in the ACSA.

Modifications and repairs

Steel repairs are expected to be identical to those for inspected vessels. This standard is documented in [NVIC 7-68](#).

Vessel modifications frequently adversely affect a vessel's stability. Each vessel modification must be accounted for in both weight and adjustment to the center of gravity. The operator's naval architect must be consulted for modifications to vessel arrangement, equipment, and fishing/processing gear.

The OCMI must be contacted prior to each modification or unplanned repair to the vessel's vital systems or watertight envelope. Each modification of a vessel must be noted in MISLE.

Section G – Machinery systems

G - Machinery Examination	Interval	References
<p>○ 1. Fuel System Fuel supply piping on the pressure side must be:</p> <ul style="list-style-type: none"> <input type="checkbox"/> <i>Vessels > 100 GT</i> <ul style="list-style-type: none"> — Seamless piping of steel, annealed copper or brass or tubing or nickel copper meeting the requirements for materials and for thickness <input type="checkbox"/> <i>Vessels < 100 GT</i> <ul style="list-style-type: none"> — Copper, nickel copper or copper nickel — Minimum wall thickness .035 inches — Seamless steel pipe or tubing/equivalent level of safety may be used <input type="checkbox"/> Non-metallic flexible hose under high pressure of at least 10 psi. allowed only where flexibility is required to prevent damage from vibration. Such hose must not be more than 30 inches in length. <input type="checkbox"/> Fuel / hydraulic hoses must meet J-1942 or SAE J-1942-1. <input type="checkbox"/> Hose fittings must comply with SAE J-147556. <input type="checkbox"/> Push-lock fittings are not acceptable. <input type="checkbox"/> Exceptions to the 30 inch rule will be allowed on a case by case basis. <input type="checkbox"/> In addition to the requirements above, approved fire sleeve material as listed in the SAE qualified hose list must be over the approved hose. 	<p>Annually</p>	<p>46 CFR 56.50-75(a) 56.60 56.50-70(a)(2) 56.50-75(b) 56.50-75(b)(3) 56.50-75(b)(2) 56.60-25(b) 60-25(b)(5)</p>
<p>○ 2. Sight gauges on tanks</p> <ul style="list-style-type: none"> <input type="checkbox"/> Must be welded or brazed to the tank <input type="checkbox"/> Must be heat resistant material <input type="checkbox"/> Protected from mechanical damage <input type="checkbox"/> Both ends of sight gauge must be fitted with devices that will automatically close should the gauge break 	<p>Annually</p>	<p>58.50-10(a)(6)</p>
<p>○ 3. Diesel propulsion machinery tests</p> <ul style="list-style-type: none"> <input type="checkbox"/> Obtain copy of the written test procedures <input type="checkbox"/> Automatic shut-down on over-speed *(if installed) <input type="checkbox"/> Low lube oil pressure alarm <input type="checkbox"/> Jacket water high temperature alarm 	<p>Annually</p>	<p>46CFR58.05-10 Table 62.35-50 ABS Rules: 4-7-1</p>
<p>○ 4. Diesel prime mover tests for generators and auxiliary equipment</p> <ul style="list-style-type: none"> <input type="checkbox"/> Obtain copy of written test procedures <input type="checkbox"/> Automatic shut-down on over-speed* <input type="checkbox"/> Alarm and shut-down of low lube oil sensor <input type="checkbox"/> Jacket water high temperature alarm <p>* If fit with computer automated diesels, provide calibration standards set by the manufacturer.</p>	<p>Annually</p>	<p>46CFR 111.12-1(c) 112.50(g)&(h)</p>

damage, and provided at the tank connections with devices that will automatically close in the event of rupture of the gauge or gauge lines

Guards and Exposed Hazards

Each exhaust pipe within 15 feet of fuel, lube, or hydraulic oil sources, must be insulated or otherwise guarded to prevent ignition.

Examination of Records and Tests

At each examination for continuation in this Program, a Marine Inspector may review preventive maintenance records, may conduct such tests and examinations of the main propulsion and electrical generation machinery, and of each auxiliary and of its associated equipment, as they feel necessary to ensure safe operation. In general, this examination should not be more thorough than that required for a mid-term inspection of an inspected vessel.

Electrical Systems

Electrical systems are important to the control and safety of the vessel. There is no requirement or expectation that electrical system installations will comply with the standards for inspected vessels in wiring material. There are many other features of electrical systems that can present safety issues and Marine Inspectors shall not overlook these. Marine Inspectors will not require replacement of electrical cabling and wiring without cause. Discovery of unsafe conditions may provide the cause for modifications to such equipment at the discretion of the Marine Inspector. Any changes to electrical systems shall be in accordance with requirements for inspected vessels.

Preventive Maintenance Programs

Poor maintenance of vessels watertight integrity and machinery are a leading cause of vessel loss. To reduce the risk and improve the reliability of vessel systems, a documented preventive maintenance program is required for vessels in the ACSA Program. The preventive maintenance program must at a minimum address the items in the vessels Maintenance Schedules Checklist. The approach to preventive maintenance is the operators' responsibility. Reliance on standards recommended by equipment manufacturers is highly recommended. A written plan and or schedule is required and records of compliance with the plan and repair records shall be checked by the Marine Inspector as part of scheduled visits.

Section H – Life saving equipment & arrangements

H - Life Saving Equipment	Interval	References
<ul style="list-style-type: none"> ○ 1. Life rafts <ul style="list-style-type: none"> ❑ Life rafts approved under 46 CFR 160.151". Any raft with CG approval number of 160.151 is acceptable regardless of other approval numbers listed. Implementation date 1 Jan 2011. ❑ Mounted so can be manually launched by one person. 	Annually	ACSA Guide section H 1
<ul style="list-style-type: none"> ○ 2. Life raft Embarkation ladders must be installed for each life raft embarkation station that is five feet or more above the waterline in normal operating conditions. <ul style="list-style-type: none"> ❑ This requirement is in addition to the NMFS required safe pilot ladder for boarding fisheries observers. In special arrangements, one ladder may satisfy both requirements. 	Annually	section H 2 50 CFR 600.506 600.504(d)
<ul style="list-style-type: none"> ○ 3. Personal Marker Lights (PML) <ul style="list-style-type: none"> ❑ Each immersion suit is required to be fitted with a Coast Guard approved strobe type PML. 	Annually	section H 3

Discussion

This section deals with the ability to evacuate a large crew quickly, safely, and effectively. This is not a classification requirement but meets or exceeds current inspected vessel standards.

Liferafts

Liferafts must meet SOLAS standards in design, materials, construction, workmanship and testing. Life rafts meeting SOLAS standards will have approval number "160.151". Any raft with a CG approval number of 160.151 is acceptable regardless of any other approval numbers that may be listed. Implementation date for this requirement is 1 Jan 2011. Four person rafts will not have SOLAS approval but are acceptable as long as they are on the current USCG approval list for Oceans Service.

All required liferafts will be mounted in a manner to be launched manually by a single person.

Subject to individual liferaft manufacturer approval, paddles for all Coast Guard approved liferafts shall be of a material other than plastic.

Coast Guard or SOLAS approved embarkation ladders will be installed for each required liferaft embarkation station that is five or more feet above the water line in normal operating conditions.

Immersion suits

Each immersion suit will be fitted with a Coast Guard or SOLAS approved strobe type PMEL lights.

Section I – Fixed firefighting equipment & arrangements

I - Fixed Fire Fighting Equipment & Arrangements (46CFR76-15 applies)	Interval	References
<ul style="list-style-type: none"> ○ 1. Spaces requiring a fixed fire fighting system <ul style="list-style-type: none"> ❑ Any space containing: <ul style="list-style-type: none"> — Internal combustion engine greater than 50 hp — An oil-fired boiler — An incinerator — Gasoline storage tank(s) or other flammable materials — Paint lockers over 60 cubic feet in volume 	Annually	46 CFR 28.320(a)
<ul style="list-style-type: none"> ○ 2. Vessel specific fixed fire fighting systems <ul style="list-style-type: none"> ❑ certified by a professional engineer for compliance with 46 CFR 76.15 and NVIC 6-72 change 1 	Annually	46 CFR 76.15 NVIC 6-72
<ul style="list-style-type: none"> ○ 3. Spaces protected by fixed CO2 systems <u>not</u> more than 300 lbs CO2 cylinders may be located inside the space protected. <ul style="list-style-type: none"> ❑ If cylinders are located <u>inside</u> the space protected: <ul style="list-style-type: none"> — a heat actuator is required that will automatically operate in addition to the remote pulls ❑ If cylinders are stored <u>in a CO2 room</u>: <ul style="list-style-type: none"> — Room must be well ventilated — Must not be located where ambient temp exceeds 130 deg. F — Cylinders must be securely fastened and supported ❑ Controls must be located outside the space protected ❑ Not located in an area that could be cut off or made inaccessible in the event of fire in the space protected ❑ Complete but simple instructions for operation of the system must be located in a conspicuous place near pull boxes and at the control station located at the cylinder location ❑ Alarm and time delay is required unless space is small and there is suitable horizontal escape from the space ❑ Perform functional test ❑ Cylinders weighed ❑ System must alarm for at least 20 seconds before CO2 is released ❑ Ventilation <ul style="list-style-type: none"> — Protected spaces with mechanical ventilation must automatically shut down on activation of the CO2 system. — Means for closing all openings to the space protected must be provided and must be able to be accomplished from outside the space. 	Annually	46 CFR 76.15-20(b) 76.15-10(a) 76.15-20(b) 76.15-20(a) 76.15-20(b) 76.15-20(d) 76.15-10(a) 76.15-10(h) 76.15-10(f) 76.15-35(a) 76.15-35(c)

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<ul style="list-style-type: none"> ○ 8. Smoke detectors in all accommodation spaces <ul style="list-style-type: none"> ❑ Acceptable detectors include: <ul style="list-style-type: none"> — Independent modular smoke detector: Must meet UL-217 as “Single Station Smoke Detector – Also suitable for use in Recreational Vehicles.” — Smoke actuated fire detecting unit: Must be installed IAW 46CFR76.33. — Other fire / smoke/ heat detectors may be approved by the local OCMI 	Annually	ACSA Guide section I discussion
<ul style="list-style-type: none"> ○ 9. Structural fire protection <ul style="list-style-type: none"> ❑ A-0 boundaries must isolate all internal combustion machinery spaces. 	Annually	ACSA Guide section I discussion
<ul style="list-style-type: none"> ○ 10. Non-combustible insulation. <ul style="list-style-type: none"> ❑ Any insulation replaced in hidden spaces should be of non-combustible material IAW 46CFR Subchapter Q. Any exceptions are at the discretion of the local OCMI. 	Annually	ACSA Guide section I discussion

Discussion

These standards require a Coast Guard inspected and National Fire Protection Association (NFPA) standards approved fixed fire fighting system for spaces with internal combustion engines and additional fire detection capability in the engine spaces and accommodation spaces. This standard meets existing inspected and classed vessel requirements.

Enclosed spaces

Each vessel must be fitted with a fixed gas fire extinguishing system in the following enclosed spaces:

1. A space containing an internal combustion engine of more than 50 horsepower (main and auxiliary spaces);
2. A space containing an oil-fired boiler;
3. An incinerator; or,
4. A space containing a gasoline storage tank or other flammable materials (such as a paint locker).

Vessel specific fire extinguishing system

All fixed gas fire extinguishing systems for main machinery spaces shall be installed in accordance with [46 CFR 76.15](#) and other appropriate NFPA standards. Such installations must be certified compliant by a vendor acceptable to the cognizant OCMI or by a licensed Professional Engineer.

Emergency communication equipment

For vessels where it is the policy to notify the master of the vessel prior to discharging the vessel’s fixed fire fighting system into the engine room, vessel owners shall install an independently powered emergency communication system between the wheelhouse and the controls to the fixed fire fighting system, to allow immediate emergency notification communication to the wheelhouse.

Each vessel must have clear procedures, signed by the master and chief engineer explaining the conditions under which fixed extinguishing systems are to be used and responsibilities of all involved parties. These procedures should be included in monthly drills.

Pre-engineered fire extinguishing system

A pre-engineered fixed gas fire extinguishing system may be installed only in a normally unoccupied machinery space (excluding main engine spaces), paint locker, or space containing flammable liquid stores that has a gross volume of not more than 33.98 cubic meters (1200 cubic feet).

1. Pre-engineered fixed gas fire extinguishing systems must:
 - a) Be approved by the Commandant for the intended application (e.g. incinerator space, bow thruster room, etc);
 - b) Be capable of manual actuation from outside the space in addition to any automatic actuation devices; and,
 - c) Automatically shut down all power ventilation systems serving the protected space and all engines that draw intake air from within the protected space.
 - d) A vessel on which a pre-engineered fixed gas fire extinguishing system is installed must have the following equipment at the operating station:
 - (i) A visual alarm to indicate the discharge of the extinguishing agent;
 - (ii) An audible alarm to sound upon discharge of the extinguishing agent; and,
 - (iii) A means to reset devices used to automatically shut down ventilation systems and engines.

Smoke / Heat Detectors

Heat detectors alarms (rate of rise / maximum temperature) shall be installed in each space fitted with a fixed gas fire extinguishing system. Coast Guard approved fire detection systems and equipment complying with [46 CFR 161.002](#), as well as, non-Coast Guard approved fire detection systems meeting the criteria listed in [46 CFR 27.203](#) are acceptable.

Accommodation spaces

Each accommodation space must be equipped with an independent modular smoke detector or a smoke actuated fire detecting unit installed in accordance with [46 CFR 76.33](#). The independent modular smoke detector must meet UL 217 and be listed as a “Single Station Smoke Detector--Also suitable for use in Recreational Vehicles.” Other fire, smoke, and/or heat detectors for accommodation spaces may be approved for use by the local OCMI.

Carbon Dioxide Detectors

In any accommodation space housing carbon dioxide storage cylinders, a carbon dioxide detector must be installed to protect the crew from the potential build up of carbon dioxide from leaking cylinders. A CO₂ detector / alarm would be acceptable if UL listed; however, there is presently no listed CO₂ detection and/or alarm equipment under the

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UL2075 standard. Therefore, the OCMI shall accept this gear on a case-by-case basis, or alternatively may accept an oxygen level detector. In the future, CO2 detectors having the UL listing may be required, if the gas detection manufacturers market a listed device suitable for this application.

Fire Hazard Surveys

Machinery spaces and escape scuttles shall be maintained in reasonable state of cleanliness to reduce the risk of fire. Flammable materials shall not be stored within machinery spaces or in escape scuttles. Scheduled examinations shall include a survey in all machinery spaces and other spaces where flammable and combustible materials are stored and used. At each examination a Coast Guard Marine Inspector or dockside examiner and the vessel representative shall conduct a fire safety hazard survey of the engine spaces to identify and remedy any additional fire safety hazards which may exist, but are not specifically identified in the ACSA Program.

Notwithstanding the need for crew to conduct normal operations, special attention shall be given to maintaining adequate egress paths from all compartments.

A-0 Boundaries

Since machinery spaces are a common source of fire aboard vessels, it is standard practice to design machinery space bulkheads to prevent the passage of smoke and flame. This contains fires that may start within these spaces and allows time for fixed extinguishing systems to be activated or other fire fighting efforts. The longer a vessel has been in service, the more likely that bulkheads isolating machinery spaces have been breached. These breaches allow fire and smoke to spread to other compartments and impair the effectiveness of fixed extinguishing agents.

A-0 bulkheads or decks must be composed of steel or equivalent material, suitably stiffened and made intact with the main structure of the vessel, such as the shell, structural bulkheads, and decks. They must be so constructed that, if subjected to the standard fire test, they are capable of preventing the passage of smoke and flame for 1 hour. It is the intent of this requirement to assure there is an intact steel bulkhead in all machinery spaces while recognizing that many ACSA vessels have bulkheads in machinery spaces that have polyurethane foam insulation on the opposite side of the bulkheads. Engine rooms and cargo holds share common bulkheads in standard ACSA vessel configurations.

Accepted methods of passing cables and piping through machinery space decks and bulkheads are often not used in an effort to save time and money or because conditions during repair do not permit proper penetrations to be used. The risk posed by these unsafe penetrations shall be reduced at the earliest opportunity. Marine Inspectors shall ensure that machinery space bulkheads and decks remain intact at each penetration. Penetrations that are discovered non-tight shall be required to be repaired within a reasonable time. All closures and vents in A-0 boundaries shall be constructed of steel or equivalent material. All closures and vents shall be capable of being secured manually from outside the space.

Section J – Other fire fighting & safety equipment

J - Other Fire Fighting and Safety Equipment	Interval	References
<ul style="list-style-type: none"> ○ 1. Portable fire/dewatering pump <ul style="list-style-type: none"> ❑ Must be independently powered ❑ Must be stowed outside the engine room ❑ Sufficient suction hose to reach water from highest lift ❑ Sufficient 1.5 inch fire hose to reach any part of the vessel ❑ Hose(s) fitted with nozzle of corrosion resistant material capable of providing solid or straight stream, and spray pattern ❑ Pump capable of producing two effective 40 foot streams from standard 1.5 inch fire hose 	<p>Annually</p>	<p>Original ACSA Agreement section J 1 section J 2(1) section J 3</p>
<ul style="list-style-type: none"> ○ 2. Fireman’s Outfits <ul style="list-style-type: none"> ❑ Vessels with <u>fewer than</u> 26 people on board shall have 2 outfits ❑ Vessels with 26 or more people on board shall have 4 outfits ❑ Fireman’s outfit shall include: <ul style="list-style-type: none"> — One positive pressure self-contained breathing apparatus, SCBA — With attached lifeline — Protective clothing with retro-reflective tape — Rigid helmet — Gloves — Boots — Fire axe (or other appropriate tool) ❑ Each SCBA will be provided with two spare air bottles 	<p>Annually</p>	<p>Original ACSA Agreement sections J4 & 5 46 CFR 96.35</p>
<ul style="list-style-type: none"> ○ 3. Crew training <ul style="list-style-type: none"> ❑ Fire team members (as identified on the Emergency Instructions as required by 46 CFR 28.265) who will wear the fireman’s outfits shall provide proof of Coast Guard approved basic fire training. 	<p>Annually</p>	<p>Original ACSA Agreement J 6 46CFR28.265</p>
<ul style="list-style-type: none"> ○ 4. Fire and Safety Plan <ul style="list-style-type: none"> ❑ Up to date Fire and Safety Plans ❑ General arrangement plans showing <ul style="list-style-type: none"> — Each control station for controlling ships radios, main navigation, emergency power, and where fire reporting and fire control equipment are centralized — Location of fire resisting bulkheads — Location of alarms — Location of extinguishing systems — Location of portable fire extinguishers — Means of access to different compartments and decks — Ventilation system and location of ventilation shut-downs and dampers — Details of alarms systems — Details of extinguishing systems 	<p>Annually</p>	<p>ACSA Guide section J 7 46 CFR 91.55-5(d)</p>

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<p>○ 5. Freon detectors (as required)</p> <ul style="list-style-type: none">❑ Installed in spaces containing main tank and compressors❑ Portable Freon detectors should also be on board	Annually	ACSA Guide section J
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Discussion

These standards seek to increase a vessels fire fighting (and de-watering) capabilities by requiring portable fire fighting capability, fireman’s outfits, and fire fighting plans. These standards meet or exceed classification requirements.

Portable dewatering pump

Each vessel must be equipped with an independently powered (independent of the ship’s auxiliary power system) portable fire/dewatering pump. The portable pump and hoses must be stowed outside the engine room.

Each pump will be provided with suction hose and strainers adequate to reach water sources for either service and must be capable of picking up suction for the highest lift. Correspondingly, discharge hose must be readily available for each service.

The pump shall be capable of producing two effective 40 foot streams, each from a standard 1.5 inches diameter lined commercial fitted with a corrosion resistant dual purpose nozzle capable of providing a solid or straight stream, and a spray pattern.

Fireman’s outfits

Each vessel with less than 26 people on board must be equipped with a minimum of (2) traditional bunker style fireman’s outfits. Each vessel with 26 or more people on board will be equipped with a minimum of (4) traditional bunker style fireman’s outfits as described in [46 CFR 96.35](#).

Each outfit will consist of:

1. One self-contained breathing apparatus, attached lifeline, flashlight, rigid helmet, boots, gloves, protective clothing with reflective tape and one fire axe.
2. At least two spare air bottles will be provided for each self-contained breathing apparatus.
3. Each SCBA must be positive pressure and approved by MSHA and NIOSH and have a minimum 30 minute air supply and a full face mask.

Crew members who are identified in the vessel’s Watch, Quarter and Station Bill as fire team members who will wear the above protective equipment shall complete Coast Guard approved basic fire-fighting training.

Fire Fighting Plans

Each vessel must have Fire and Safety Plan which shows the location of all safety equipment and fire fighting equipment. Marine Inspectors shall ensure its accuracy at each examination.

Freon Detectors

Freon Detectors are only required when Freon is used in freezer hold systems and will not be required when used in applications such galley refrigerators and air conditioners.

Section K – Emergency drills & training

K - Emergency Drills	Interval	References										
<p>○ 1. As part of the ACSA annual exam, drills must be conducted in the presence of a USCG Examiner</p> <ul style="list-style-type: none"> ❑ The drills must be conducted with the vessel's crew on board ❑ The drills should include: <ul style="list-style-type: none"> — Abandon ship — Launching survival craft — Donning immersion suits or PFDs — Making voice radio distress calls / using visual distress signals — Recover person overboard — Activating general alarm — Reporting inoperative alarm & fire detection systems — Minimizing effects of accidental flooding — Fighting a fire — Donning Fireman's outfits / SCBAs if equipped 	<p>Annually</p>	<p>46 CFR 28.275 28.270</p> <p>" "</p> <p>" "</p>										
<p>○ 2. Required number of qualified drill conductors in crew complement</p> <table border="1" data-bbox="287 949 1144 1199"> <thead> <tr> <th>Persons on board</th> <th>Certified Drill Conductors</th> </tr> </thead> <tbody> <tr> <td>Less than 16</td> <td>2</td> </tr> <tr> <td>16-25</td> <td>3</td> </tr> <tr> <td>26-35</td> <td>4</td> </tr> <tr> <td>36 or more</td> <td>At least 5</td> </tr> </tbody> </table>	Persons on board	Certified Drill Conductors	Less than 16	2	16-25	3	26-35	4	36 or more	At least 5	<p>Annually</p>	<p>Original ACSA section K 1-4</p>
Persons on board	Certified Drill Conductors											
Less than 16	2											
16-25	3											
26-35	4											
36 or more	At least 5											
<p>○ 3. Record keeping of emergency drills and training</p> <ul style="list-style-type: none"> ❑ Logged by the master <ul style="list-style-type: none"> — Includes date of each drill — Conducted not more than 30 days from previous drill — Log should indicate those that did not participate and why — Must be maintained on board for 1 year and in the main office for 3 years 	<p>Annually</p>	<p>Original ACSA section K 6</p>										
<p>○ 4. Communications among crew</p> <ul style="list-style-type: none"> ❑ If crew or process workers include non-English speaking members <ul style="list-style-type: none"> — Vessel has tapes/CDs that provide training on emergency procedures in the language spoken — Training tapes/CDs similar to AMSEA or NPFVOA safety videos 	<p>Annually</p>	<p>Original ACSA section K 5</p>										

Discussion

This section increases on board trained drill instructor, fosters effort to improve multi-language training and requires a record of emergency drills and training. This is not a classification issue, but meets or exceeds current inspected vessel standards.

Language

Every reasonable effort shall be made, including the use of North Pacific Fishing Vessel Owners Association and Alaska Marine Safety Education Association Spanish & Vietnamese language safety videos, to ensure that all non-English speaking crew members and fish processing personnel are familiar with their emergency responsibilities and duties.

Sailing Short

At the outset of a voyage a vessel should "possess" the complement of certificated drill conductors as stipulated in this section. In certain unusual circumstances, when vacancies occur at or after the time the crew is required to be aboard, the vessel may sail short, provided the vacancy was without the consent, fault, or collusion of the master, owner, or any other person interested in the vessel, and the master has made a conscientious effort to find a qualified replacement. In addition, the master must be satisfied that the vessel is safe to make the intended voyage. Desertion, arrest, failure to join, hospitalization, etc., are considered to be unusual circumstances and may be grounds for sailing short if the master considers the remaining complement sufficient. However, at each port or place called at during the voyage (including the port of departure), the master has an obligation to obtain qualified replacements if they are available. The master need not obtain permission to sail short, but must report the situation in writing within 12 hours of arrival at the port of destination. The master's decision to sail short is subject to the OCMI's review and appropriate administrative action should be taken if warranted.

Logging of drills

All emergency drills and training shall be logged by the master of the vessel. Emergency drill log entries must include the name and reason for missing the drill for each person not participating in an emergency drill. Emergency drills and training records shall be maintained on board the vessel and at the vessel's home office for three years.

Frequency of drills

Emergency drills shall be conducted at least once each 30 days and must cover all contingencies listed in [46 CFR 28.270](#). Additionally, drills must be conducted anytime a person with safety responsibilities is replaced. Within each 30 days each person on board must have received training complying with [46 CFR 28.270](#).

Orientation of new members

The requirements for orientation of new persons on board is in [46 CFR 28.270](#).

Section L – Emergency communication and navigation

L – Emergency Communications and Navigation	Interval	References
<p>○ 1. Notification prior to discharging fixed systems into machinery spaces</p> <ul style="list-style-type: none"> □ If vessel policy requires notification of the Master <ul style="list-style-type: none"> — Must have installed communication system between activation control station and wheelhouse — Emergency hand-held radios may be used to meet this requirement — Must be located on bridge, and at fixed fire extinguisher system control stations 	Annually	<p>Original ACSA section L 1</p>
<p>○ 2. Procedures for activating the fixed extinguishing system</p> <ul style="list-style-type: none"> □ Must have clear written procedures □ Signed by Master and Chief Engineer 	Annually	<p>Original ACSA section L 2</p>
<p>○ 3. Automatic Identification System (AIS)</p> <ul style="list-style-type: none"> □ Fish processing vessels greater than 65 feet must have an approved AIS installed and operational 	Annually	<p>33 CFR 164.46</p>
<p>○ 4. Global Maritime Distress Signal System (GMDSS) <i>Fish Processing Vessel 300 GT and over:</i></p> <ul style="list-style-type: none"> □ Search and Rescue Transponder (SART) <ul style="list-style-type: none"> — < 500 GT 1 SART — ≥ 500 GT 2 SARTs □ 3 VHF handheld transceivers NOTE: A transceiver permanently installed in a life raft may be counted toward this requirement <ul style="list-style-type: none"> — Must operate on channel 16 and one other channel (channel 6 recommended) □ 2 VHF radio installation <ul style="list-style-type: none"> — Capable of operating on: <ul style="list-style-type: none"> - Channel 6 (156.3 MHz), - Channel 13 (156.65 MHz); and, - Channel 16 (156.8 MHz) □ 1 MF radio installation (Single Side Band) <ul style="list-style-type: none"> — Capable of operating on: <ul style="list-style-type: none"> - 2182 kHz, <u>and</u> - 2 other frequencies between (1605-3500 kHz) □ 1 NAVTEX receiver 	Annually	<p>NVIC 3-99 Table 5 47 CFR 80.1095(b) 80.1095(a)</p> <p>47 CFR 80.855 80.1085(a)(4)</p>

Discussion

These standards institute particular requirements to preserve positive administrative controls relative to discharge of fixed fire fighting systems. It also implements use of GMDSS and AIS equipment. This is not a classification issue, but meets or exceeds current inspected vessel standards.

Portable communication equipment

Emergency handheld radios may be used to meet this requirement, so long as the radios are stowed upon the bridge and at the controls to the fixed fire fighting system.

Global Maritime Distress Signal System (GMDSS)

All vessels enrolled in the alternative compliance agreement shall be in compliance with Coast Guard [Navigation and Vessel Inspection Circular 3-99](#).

Automatic Identification System (AIS)

In accordance with [33 CFR 164.46](#), all vessels must be equipped with a properly installed and operational AIS system.

Annex 1 – Product Codes

The products listed below are identified by the National Marine Fisheries Service regulations 50 CFR, Part 679, Table 1. These products are typical of the Head & Gut fleet.

Product codes designated “H&G” are not considered processing. A vessel that produces these products does not need to enter the ACSA Program.

Product codes designated as “Beyond Minimal Processing” are considered processing. Vessels in compliance with the ACSA Program are allowed to produce these products.

Those product codes identified as “Extensive Processing” are not allowed to be produced by vessels enrolled in or in compliance with the ACSA Program. Only fish processing vessels that are fully classed and load-lined as required by [46 CFR 28.720](#) and 46 CFR Subchapter E, or that meet the definition of being “grandfather” are allowed to produce these products.

Any other product by ACSA enrolled vessels are not authorized without special consideration and evaluation by Commandant (CG-543).

Product Code	Product Code Name	Description	USCG Determination
3	Bled Only	Throat, or isthmus, slit to allow blood to drain.	H & G
4	Gutted, Head On	Belly slit & viscera removed	H & G
5	Gutted, Head Off	Belly slit & viscera removed	H & G
6	Head & Gutted, with Roe	None	H & G
7	Headed & Gutted, Western Cut	Head removed just in front of the collar bone, & viscera removed.	H & G
8	Headed & Gutted, Eastern Cut	Head removed just behind the collar bone, & viscera removed.	H & G
13	Wings	On skates, side fins are cut off next to body	H & G
36	Mantles, Octopus or Squid	Flesh after removal of viscera & arms	H & G
42	Bled Fish destined for Fish Meal	(Includes offsite production)	H & G
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery rate next to it in parenthesis.	Determination on a Case by Case Basis

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10	Headed & Gutted, Tail Removed	Head removed usually in front of collar bones, viscera & tail removed	Beyond Minimal Processing
11	Kirimi (Steak)	Head removed either in front or behind the collar bone, viscera removed, & tail removed by cuts perpendicular to the spine, resulting in a steak.	Beyond Minimal Processing
14	Roe	Eggs, either loose or in sacs, or skeins (Ancillary only)	Beyond Minimal Processing
15	Pectoral Girdle	Collar bone & associated bones, cartilage & flesh	Beyond Minimal Processing
16	Heads	Heads only, regardless where severed from body (Ancillary only)	Beyond Minimal Processing
17	Cheeks	Muscles on side of head (Ancillary only)	Beyond Minimal Processing
18	Chins	Lower jaw (mandible), muscles, & flesh (Ancillary only).	Beyond Minimal Processing
34	Milt	In sacs, or testes (Ancillary only)	Beyond Minimal Processing
35	Stomachs	Includes all internal organs (Ancillary only)	Beyond Minimal Processing
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery rate next to it in parenthesis.	Determination on a Case by Case Basis
12	Salted & Split	Head removed, belly slit, viscera removed, fillets cut from head to tail but remaining attached near tail. Product salted.	Extensive Processing
19	Belly Flaps	Flesh in region of pelvic & pectoral fins & behind head (Ancillary only)	Extensive Processing
20	Fillets with Skin & Ribs	Meat & skin with ribs attached, from side of body behind head & in front of tail.	Extensive Processing
21	Fillets with Skin, no Ribs	Meat & skin with ribs removed, from side of body behind head & in front of tail.	Extensive Processing
22	Fillets with Ribs, no Skin	Meat with ribs with skin removed from sides of body behind head & in front of tail.	Extensive Processing
23	Fillets, Skinless / Boneless	Meat with both skin & ribs removed, from sides of body behind head & in front of tail.	Extensive Processing
24	Fillets, Deep-Skin	Meat with skin, adjacent meat with silver lining, & ribs removed from sides of body behind head & in front of tail, resulting in thin fillets.	Extensive Processing
30	Surimi	Paste from fish flesh & additives	Extensive Processing
39	Bones	(If meal, report as 32) (Ancillary only)	Extensive Processing
97	Other Retained Product	If product is not listed on this table, enter code 97 & write a description with product recovery	Determination on a Case by Case

Annex 2 – Compliance Matrix

Section	Section Title	USCG District Commander	Accepted Organization (ABS / DNV)	Surveyor from a Similarly Qualified Organization	USCG Marine Inspector	USCG Fishing Vessel Examiner	Naval Architect
A	ACSA Enrollment (Exemption Letter)	<i>Every two years</i>					
A	ACSA Exemption Renewal Examination				<i>Every Two Years</i>		
A	ACSA Mid-period Examination				<i>Annually</i>		
A	Certificate of Compliance or Coast Guard exam to include (46 CFR 28) (33 CFR 151 & 155)		<i>Annually</i>	<i>Annually</i>	<i>Annually</i>	<i>Annually</i>	
B	Stability Tests & Reports		<i>5 Years</i>				<i>5 Years</i>
C	Drydock / Internal Structural Exam				<i>Twice in 5 Years, NTE 3 Years</i>		
D	Tail Shaft Exam				<i>See sec. D</i>		
E	Hull Audio Gauging				<i>5 Years</i>		
F	Watertight & Weather-tight Closures				<i>Annually</i>	<i>Annually</i>	
G	Machinery Inspection				<i>Annually</i>		
H	Life Saving Arrangements				<i>Annually</i>	<i>Annually</i>	
I	Fixed Fire Fighting Arrangements				<i>Annually</i>	<i>Annually</i>	
J	Other Fire Fighting Equip & Plans				<i>Annually</i>	<i>Annually</i>	
K	Emergency Drills & Training				<i>Annually</i>	<i>Annually</i>	
L	Emergency Communications				<i>Annually</i>	<i>Annually</i>	

Annex 3 – Grandfathered Fish Processing Vessels

Grandfathered Fish Processing Vessel

In order for a fish processing vessel to be considered grandfathered and therefore not required to meet the provisions of [46 CFR Part 28 Subpart F](#), the vessel must meet the following:

Loadline

For domestic voyages ([46 U.S.C. 5102\(b\)\(4\)](#)), a fish processing vessel of not more than 5,000 gross tons must have a valid Load Line Certificate or must be exempted from the requirement to have a Load Line Certificate by meeting one of the following conditions:

- A. The vessel must have been **constructed** as a fish processing vessel before August 16, 1974 ([46 U.S.C. 5102\(b\)\(4\)\(A\)\(i\)](#)); or
- B. The vessel must have been **converted** for use as a fish processing vessel before January 1, 1983 ([46 U.S.C. 5102\(b\)\(4\)\(A\)\(ii\)](#)), or
- C. The vessel must be **150 gross tons or less** ([46 U.S.C. 5102\(b\)\(10\)](#)), and had the keel laid or constructed as a fish processing vessel before January 1, 1986 ([46 U.S.C. 5101\(3\)](#)).

Classed

The vessel must have a valid certificate of class or must be exempted from the survey and classification requirements ([46 U.S.C. 5102\(b\)](#)). In order for a vessel to be exempted from the survey and classification requirement:

- The vessel must have been **built as** or **converted** to a fish processing vessel on or before July 27, 1990, and not undergone a major conversion¹*

Maintaining Grandfather status

The District Commander will determine whether a vessel is eligible for grandfathered status on a case-by-case basis. In order for a fish processing vessel to maintain grandfather status the vessel must not have converted the use of the vessel to any other type. If at any time the vessel which was operating as a fish processing vessel changed the “type of vessel ([46 U.S.C. 2101\(14a\)\(B\)](#))” to that of a fishing vessel (not processing) or a fish tender vessel (not processing), after any of the above thresholds, the vessel will be considered to have undergone a major conversion and the eligibility for grandfather status would be invalid.

¹ Under [Title, 46 U.S.C. 2101\(14a\)](#) a “major conversion” means a conversion of a vessel that:

- (A) Substantially changes the dimensions or carrying capacity of the vessel;
- (B) **Changes the type of the vessel;**
- (C) Substantially prolongs the life of the vessel; or
- (D) Otherwise so changes the vessel that it is essentially a new vessel.

Annex 4 – Sample Renewal Request Letter

BERING COD LLC 1445 NW 4TH AVE. SEATTLE, WA 98134 206-221-8567

November 21, 2010

Commander (dpi)
Attn: Commercial Fishing Vessel Safety Coordinator
Thirteenth Coast Guard District
915 Second Avenue, Suite 3506
Seattle, WA 98174

Dear Sir:

I am requesting renewal of your March 24, 2008 letter granting exemption for 46 CFR Part 28.720 requiring the vessel to be classed by the American Bureau of Shipping or a similarly qualified organization, and from 46 CFR Subchapter E, requirements for a loadline certificate, under the Alternate Compliance Safety Agreement (ACSA) program for our vessel the F/P BERING COD, O.N. 125346

The vessel continues to produce fish products with NMFS product codes determined to be “beyond minimal processing.” We therefore authorize marine examination representatives of the United States Coast Guard aboard for initial, mid-period, and periodic examinations to ensure continued compliance with exemption letter requirements.

We agree to continually maintain the vessel in compliance with the latest revision of the “Guidance for the Alternate Compliance and Safety Agreement Program.”

Signed Owner.

Annex 5 – Sample ACSA Exemption Letter

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
United States Coast Guard
Thirteenth Coast Guard District

915 Second Ave
Seattle, WA 98174-1067
Staff Symbol: (dp)
Phone: 206-220-7216
FAX: 206-220-7225

16716

September 10, 2010

Bering COD LLC
1445 NW 4th Ave.
Seattle, WA 98134

Subj: EXEMPTION FROM 46 CFR 28.720 & 46 CFR SUBCHAPTER E AND ISSUANCE OF CERTIFICATE OF COMPLIANCE (COC)
BERING COD, O.N. 125346

Ref: (a) Commandant G-PCV Policy Letter 06-03 dated July 1, 2006
(b) Guidance for the Alternate Compliance and Safety Agreement Program
(c) 46 CFR 28.60
(d) 46 CFR 42.03-20 & 30

Dear Sir or Madam:

On July 5th, 2010 you requested exemption from the requirements of Title 46 Code of Federal Regulations (CFR) 28.720, requiring the vessel to be classed by the American Bureau of Shipping (ABS) or a similarly qualified organization, and from 46 CFR Subchapter E, requirements for a Load Line Certificate, under the Alternate Compliance and Safety Agreement (ACSA) Program as described in references (a) and (b). This application constitutes acknowledgement that the subject vessel operates as a fish processing vessel as defined in 46 CFR Part 28.

On August 6th, 2010 you completed all requirements to remain in the ACSA program. This allows the vessel to continue to operate as a fish processing vessel to produce only those products as listed as "H & G" and "Beyond Minimal Processing" in Annex 1 of the ACSA Implementation Guide. This exemption does not allow for the processing of products as listed as "Extensive Processing" in Annex 1 of the ACSA Implementation Guide.

In accordance with references (c) and (d), I hereby grant the subject vessel exemption from the requirements of 46 CFR 28.720 and 46 CFR Subchapter E subject to the following restrictions:

(a) **This exemption shall expire on August 6th, 2012** unless terminated earlier. You must request an ACSA exemption renewal exam and issuance of a new exemption letter 60 days prior to the expiration of this exemption;

ACSA Guidance

- (b) An ACSA mid-period exam shall be completed within sixty days either side of August 6th, 2011;
- (c) This vessel has been examined and found to be in compliance with Subchapter C, 46 CFR Parts 24-28. Next COC exam is required no later than August 6th, 2011 and may be completed in conjunction with the ACSA mid-period exam.
- (d) A COC exam must be conducted by the ABS, a similarly qualified organization, or a surveyor of an accepted organization. Alternatively, the U.S. Coast Guard may in conjunction with the ACSA annual examination, certify compliance with 46 CFR Subchapter C by endorsing the appropriate block at the end of this letter.

- (e) Next dry-dock is required no later than December 13th, 2012. The Coast Guard shall be notified prior to any drydock examination, hull plating repairs, addition or removal of major vessel equipment or fishing/processing equipment, or in the event of a casualty to the vessel's major machinery;
- (f) All other requirements of 46 CFR Part 28 apply.

In granting these exemptions I have considered that a) good cause exists for the subject exemptions and b) by granting these exemptions the safety of the vessel and those on board will not be adversely affected.

This letter must be kept aboard the vessel. The original endorsements contained on page 3 must remain attached to this letter for reference by concerned parties.

If you have questions or require further assistance, please contact Mr. Troy Rentz, Fishing Vessel Safety ACSA Coordinator, Thirteenth Coast Guard District, at (206) 220-7216
Troy.Rentz@uscg.mil.

Sincerely,

Captain, U.S. Coast Guard
Chief, Prevention Division
by direction of the Commander,
Thirteenth Coast Guard District

Encl: (1) Classification of Product Codes (Annex 1 of the ACSA Implementation Guide)

Copy: MISLE Vessel Documents

ACSA Guidance

ACSA Mid-period Exam Endorsement:

The fishing vessel has been examined and found to be in substantial compliance with the Alternate Compliance Safety Agreement (ACSA).

Name Unit Location Date Examiner's signature

Certification of Compliance (COC) Endorsement:

This is to certify that the fishing vessel has been examined and found to be in compliance with Subchapter C, 46 CFR Parts 24-28

Name Unit Location Date Examiner's signature

Dry-dock Exam Endorsement:

A Dry-dock Exam has been completed. The vessel is in substantial compliance with Sections B thru G of the Guidance for Implementation of the Alternate Compliance Safety Agreement.

Name Unit Location Date Examiner's signature

Renewal Examination (for renewal of the ACSA Exemption Letter):

The fishing vessel has been examined and was determined to be in substantial compliance with the Alternate Compliance Safety Agreement. Accordingly, I recommend that this vessel be granted an exemption from 46 CFR 28.720 and 46 CFR Subchapter E, as provided for in the ACSA program.

Name Unit Location Date Examiner's signature