

# MSC Guidelines for Review of Technical Spaces Behind Linings

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S. E. HEMANN, CDR, Chief, Hull Division

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## References

- ❑ SOLAS II-2/9.2.2.3.2.2 (previously II-2/26.2)
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## Contact Information

If you have any questions or comments concerning this document, please contact the Marine Safety Center by e-mail or phone. Please refer to Procedure Number: **SOLAS-30**.

E-Mail: [msc@uscg.mil](mailto:msc@uscg.mil)

Phone: (202) 795-6730

Website: <http://homeport.uscg.mil/msc>

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## Reference Text

".Smaller, enclosed rooms within a space that have less than 30% communicating openings to that space are considered separate spaces. The fire integrity of the boundary bulkheads and decks of such smaller rooms shall be prescribed in tables 9.1 and 9.2."

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## Guidance

Access panels/doors should only provide access to the equipment being maintained and should have restricted accessibility through the use of door locks. With the panel/door open, any reachable horizontal surface (such as the deck) that could be used for storage should be blocked with a permanent barrier. Otherwise, the area should be protected with sprinklers and detectors. Doors extending the full height of the lining should not be used. Instead, panels that require mechanical disassembly should be used. In general, if the opening is such that a person can walk into the area behind the lining, this area should be treated as a separate space.

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## Background

On most passenger ships, uncategorized and somewhat concealed spaces are created between bulkheads and associated bulkhead linings. Generally, access to these areas is necessary for maintenance and operation of valves, distribution boxes, etc. While this arrangement is acceptable, concerns arise when the area behind the lining is large enough to permit storage. Sometimes, it is not simply the size of the area but the size of the opening providing access that is of concern.

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## Disclaimer

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 can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact The Marine Safety Center, who is responsible for implementing this guidance.

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