

142-003

Is an aluminum storage cabinet acceptable?

Response: [§142.225\(c\)\(3\)](#) specifies steel. However, if someone would like to propose an Aluminum cabinet with sufficient insulation, we would consider it.

See [CVC-WI-010\(2\)](#), [OCMI Guidance on Special Consideration for 46 CFR Subchapter M Vessels](#).

Received June 2016

Answered 28 February 2017, updated 07 October 2020

142-004

The list of system types should be updated to account for new technology.

The categories listed cover all required approved system. If new technology emerges, the Coast Guard (CG-ENG-4) will evaluate it for equivalency to that required by regulations.

Received June 2016

Answered 28 December 2016

142-005

46 CFR §142.240 indicates that annual (portable and semi-portable) fire extinguisher inspections are carried out per NFPA 10 – “qualified service organization,” but there is no requirement for fixed extinguishing systems (Halon, FM 200, CO2, or others) to be done by a qualified service organization. Was this intended?

46 CFR [§142.240\(a\)\(2\)](#) does not explicitly state inspection and maintenance of a fixed fire-extinguishing systems has to be completed by a “qualified service organization”; however, it does state, “Fixed fire-extinguishing systems must be inspected and tested, as required by Table 142.240...”. 46 CFR Table 142.240 says, “Test...as stated in the system manufacturer’s instruction manual...” Manufacturer’s instruction manuals may require servicing by trained and qualified personnel.

Received June 2016

Answered 17 September 2019, updated 07 October 2020

142-006

Regs require the detection system be designed and installed by an appropriately certified entity. The requirements are more specific than those for verifying entities in §144.140. Specifically - a PE in 142 must have "experience in fire-detection system design" vice in 144 "not exceed the scopes of his/her license."

Two questions come from this language:

- 1) Does the system need to be designed by a PE under §142.330 or does the overall construction verification work here.**
- 2) If the CG option is employed can a CG inspector verify the install?**

Believe this requirement was put in Subchapter C because there was no CG inspection, does the CG option negate that concern, what about PE or Class design verification and TPO surveys?

1) The system must be designed by one of the authorized entities required in 46 CFR [§142.330\(a\)\(7\)](#). Construction verification compliance in [Part 144](#) is only authorized for items specifically mentioned within part 144. For fire protection this includes only items outlined in 46 CFR [§§144.400 thru 144.430](#); therefore, construction verification compliance would not be applicable to the installation and inspection of fire-detection systems.

2) No. In the Coast Guard option scenario, the initial installation must be inspected by either a registered professional engineer with experience in fire-detection system design or by a technician with qualifications as a National Institute for Certification in Engineering Technologies (NICET) level IV fire alarm engineering technician as outlined in 46 CFR [§142.330\(a\)\(7\)](#).

Received 1 August 2016

Answered 4 August 2017, updated 07 October 2020

142-007

(1) How does the final rule on Harmonization of Standards for Fire Protection, Detection, and Extinguishing Equipment (published 22 July) impact the fire protection regulations in Subchapter M?

(2) What is the impact on vessels traveling exclusively on domestic rivers?

(1) On July 22, 2016, we published the final rule on the Harmonization of Standards for Fire Protection, Detection, and Extinguishing Equipment ([81 FR 48219](#), pages 48219-48304), which primarily modernized the references to fire extinguisher classifications. Portable fire extinguishers will continue to be marked with the weight-based classification until we are confident that there are no more conflicts.

On October 25, 2018, we published the final rule on Harmonization of Fire Protection Equipment Standards for Towing Vessels ([83 FR 53818](#), pages 53818-53822), which applied the changes made in the 2016 final rule to inspected towing vessels.

(2) The requirements for vessels on rivers routes are in Subchapter M.

Received August 2016

Answered 14 November 2016, updated 07 October 2020

142-008

How will engine room alarms be tested?

As per manufacturer's instructions as outlined in 46 CFR [§142.330\(a\)\(2\)](#).

Received 9 August 2016

Answered 28 February 2017, updated 07 October 2020

142-009

46 CFR §142.226 states towing vessels 79' or greater operating on oceans and coastwise route that does not have an installed fixed fire extinguishing system must have two firefighter outfits and two SCBAs. Can you please advise what would be required for a tug less than 79' on coastwise or ocean routes?

There are no firefighter outfit requirements for towing vessels less than 79' in length operating on oceans and coastwise route. See the ITV FR preamble for further clarification (preamble [40057](#)).

Received 12 Sep 2016

Answered 28 Feb 2017, updated 07 October 2020

142-010

Are fire detection systems that are approved for subchapter T vessels suitable for subchapter M (ANSUL Check fire marine electric detection and control system)?

Unless the Coast Guard Type Approval Certificate specifically states the equipment is limited to a certain inspection subchapter and/or type or size of vessel; all approved equipment is suitable for use on inspected towing vessels.

Received 15 September 2016

Answered 4 August 2017

142-011

How many fire hydrant stations are required on a towing vessel? Does a combination of fixed fire main and portable fire pump meet the standards?

As per 46 CFR [§142.325\(c\)](#), the fire main must have a sufficient number of fire hydrants with attached hose to allow a stream of water to reach any part of the machinery space using a single length of fire hose.

Received 15 September 2016

Answered 28 February 2017, updated 07 October 2020

142-012

The UL 1275 standards are for “indoor” storage of flammable liquids. It does not address “exterior” storage of flammable liquids. If the storage is on the exterior of the vessel would this requirement be applicable? If on the exterior could a metal rack or plastic storage bin be acceptable?

Regardless of location on the vessel, dedicated flammable/combustible storage cabinets must be either:

- 1) A storage cabinet that satisfies UL 1275;
- 2) A storage cabinet that satisfies FM Approvals Standard 6050; or
- 3) Another suitable steel container that provides an equivalent level of protection.

Plastic would not be acceptable.

See also [CVC-WI-010](#), Guidance for Special Consideration for Subchapter M Vessels.

Received 11 October 2016

Answered 4 August 2017, updated 07 October 2020

142-013

Can a single hose or one side of a Siamese fitting be used to meet the pitot tube pressure and flow rate requirements of §142.325(a)(1)?

No. 46 CFR [§142.325\(a\)\(1\)](#) requires that a fixed pump must be able to deliver water at a pitot-tube pressure of 50 psi and flow rate of 80 gpm for one of two scenarios:

- 1) From the two highest hydrants; or
- 2) From both branches of the fitting if the highest hydrant has a Siamese fitting.

The regulation specifically states that the pressure must be taken at the hydrant, not the end of the hose.

See also [CVC-WI-010](#), Guidance for Special Consideration for Subchapter M Vessels.

Received 26 October 2016

Answered 4 August 2017, updated 07 October 2020

142-015

Appreciate if you could provide both a summary and detail explanation on the rules concerning proper storage of Flammable & or combustible paint on board towing vessels under Subchapter M.

We believe that 46 CFR [§142.225](#) adequately describes the requirements for storage of flammable or combustible products and no further explanation is necessary. For further discussion on this topic see preamble page [40057](#), middle column.

Received 28 March 2017

Answered 3 July 2017, updated 07 October 2020

142-017

Are existing Halon (or CO2 systems for that matter) acceptable on existing vessels “as is?” Is the Coast Guard going to require further assessment of agent volumes, piping, nozzles, placement of pressure switches, etc.? Subchapter M only discusses “fixed systems” but doesn’t direct operators to design or performance standards.

Existing vessels must comply with Subchapter M on July 20, 2018. 46 CFR [§142.215\(a\)](#) states that all fixed fire-extinguishing systems required by part 142 must be approved by the Commandant (CG-ENG). The definition of a “fixed fire-extinguishing system” can be found in [46 CFR §136.110](#), which also provides references for the design requirements of each system. A fire-extinguishing system must have been approved by the Commandant at the time of installation and meet the design and installation standards required by regulations at the time of installation or new regulations if they are retroactive. Fire-extinguishing systems onboard an existing vessel need to meet the requirements referenced in 46 CFR §136.110. Halon systems or other extinguishing systems that are no longer approved by the Commandant will have to demonstrate that the system was approved at the time of installation.

Received 16 May 2017

Answered 27 August 2018, updated 07 October 2020