

Summary of modifications to the ACSA Guide

Revision 3 - March 2012

- **Cover**
 - o Latest revision number placed on bottom
 - o Added Fish Safe and On-line ACSA Guide web info
- **Table of Contents**
 - o revised reflecting modifications
- **Introduction, page 1**
 - o Revised the introduction paragraph to distinguish the ACSA program from programs authorized in the 2010 CG Authorization Act.
 - o Added CG-543 Policy Letter 12-01 superceded G-PCV policy letter 06-03, The new policy letter sets forth the ACSA Guide as the source for criteria and instructions regarding ACSA safety requirements and exemptions, which can be updated annually without necessarily requiring changes to the policy letter
- **Who is covered by ACSA, page 5**
 - o Clarified that vessels with valid Load Line Certificates need not complete the dry-dock and hull gauging sections of the checklist.
- **Section A – Administration**
 - o Dry-dock & load line clarification (page 6). Vessels with valid Load Line Certificates need not complete the dry-dock and hull gauging sections of the checklist, unless deemed applicable by the USCG. This is to avoid re-checking items verified by the Classification Society. This clarified further on page 20.
 - o Page 20 Note: The USCG will still need to be notified and attend vessel dry-docks to check ACSA agreement items that do not correlate with items in the Load Line Convention (i.e. factory interlocks, rudders, shafts, pressure vessels, fire boundary...)
 - o Expanded paragraph on appeals to requirements (page 10) to clearly define how appeals are made and to whom.
 - o Consolidated ACSA exemption letter guidance into one area (pages 15 & 16). Previously guidance on ACSA exemption letters was spread-out in other areas of the document.
- **Section C, Dry-docking and internal structural exams.**
 - o Changed interval for fuel tank internal exams from twice in a five year period to once every 5 years to match inspected vessel standard (page 19). Trawler sterns: Additional dry-dock checklist item - Examine outer transom, ramps & wear plates, interval 5 yrs (page 19, checklist item 5) Ref: ALASKA RANGER Recommendation #31
 - o Added guidance for requesting dry-dock extensions (page 21).
- **Section E, Tail shaft and Rudder Exams**
 - o Intervals vary significantly depending on shaft type. Added lines on checklist to clearly align shaft type with the appropriate interval (page 23)

- **Section F, Watertight and Weathertight Integrity**
 - o Added “and Weathertight” to title to indicate the section covers both watertight and weathertight (page 27).
 - o Separated watertight doors from weathertight doors, as the requirements vary significantly (page 27).
 - o Added checklist item for maintaining existing “below deck” watertight subdivision so that every requirement in the ACSA guide has a checklist item. Previously it was hard to find as the requirement was only written in the discussion paragraph (page 28).

- **Section G – Machinery Systems.**
 - o The following checklist item was added to page 31:
 - 5. Generators**
 - Test reverse power relays or mechanical interlock
 - Note: For reverse power relays slow the prime mover of the unit in which you wish to test and verify that the RPR opens as designed.*
 - Technician reports stating appropriate tests conducted and test results will be accepted as satisfying this requirement.*
 - o Vital system piping and non-metal expansion joints were moved from the dry-dock section to the machinery systems section as these items are not covered by the load line convention (page 32).
 - o Corrected wording for pressure-relief valve settings. Now states “Set to relieve at or below MAWP”(page 32).

- **Section H - Life Saving Equipment & Arrangements.**
 - o Life rafts. Deleted implementation date for having life rafts approved under 160.151, date has passed (page 35).

- **Section I - Fixed Firefighting equipment and arrangements**
 - o Reworded checklist item for fixed fire extinguishing systems in main engineering spaces to clarify that they may be approved by an accepted vendor or a licensed professional engineer (page 36).
 - o Checklists will be developed at a later time for FM 200 & loop systems (page 37).
 - o Non-combustible insulation. Any insulation replaced in hidden spaces must be of non-combustible material IAW 46CFR Subchapter Q. *changed should to must.*(page 38).

- **Section J -Other Fire Fighting and Safety Equipment**
 - o CO2/Halon Detection. CO2 detection is currently required in any accommodation space where CO2 gas cylinders are stored. Added Halon detection for applicable vessels *Implementation date 1 Jan 2013* (page 42).
 - o Added checklist item. freon detectors must be calibrated within the manufacture’s specifications(page 42).

- **Section K Emergency Drills and Training**
 - o Simplified the list of drills to be conducted in the presence of a USCG Examiner. Previously all 10 contingencies in 46 CFR 28.270 were listed (page 43).
 - o Moved the 10 CFR contingencies to #3 (Record Keeping). “Records of drills and instruction include at least the following 10 contingencies:”(page 43)

- **Section L Emergency Communications and Navigation**
 - o Notification prior to discharging fixed firefighting systems. Simplified wording. Previous wording was confusing (page 45).

- **Annex 4**
 - Updated sample company exemption request (page 51).

- **Annex 5**
 - Updated sample ACSA Exemption Letters (page 52).

- **Misc.**
 - Sector Seattle was replaced with Sector Puget Sound throughout the document
 - All references that previously read “Original ACSA Agreement” were replaced by “ACSA Guide”.
 - Relocated hull thickness gauging from Section E to Section D, so that it is adjacent to Section C (dry-docking and internal exams).
 - Where appropriate through-out the document references to the Head & Gut fleet were replaced with “Bering Sea/Aleutian Island (BSAI) and Gulf of Alaska (GOA) cod freezer longliner and non-pollock freezer trawler fleets”. “H&G Fleet” was also replaced with other language such as “ACSA fleet” when appropriate. The product codes in Annex 1 specify “Head & Gut” (H & G) operations that are not considered processing. A vessel that produces only H & G products is considered to be a fishing vessel and does not need to enter the ACSA Program.

Revision 2, 2010

- **Cover**
 - Changed the document name: removed “Implementation” since the program has been implemented.
 - Latest revision date on the bottom

- **Table of Contents**
 - revised reflecting modifications
Pages 1-2, Points of contact updated: Due to rotation at the Marine Safety Detachments the main number for scheduling inspections has been listed vs. one particular POC.
 - Page 9, Applicability checklist for classed and load lined vessels that do not need exemption: added Certificate of Class and Load line Certificate to list of documents needed for fish processing vessels that do not need exemption under ACSA
 - Deleted paragraph regarding compliance date of 1 Jan 2008.

- **Page 10**
 - New wording. "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”.

- **Section A – Administration**
 - Administrative tasks were divided according to role (Coast Guard, vessel owner/operator, third party examiners)
 - New wording for Coast Guard District 13 and District 17 roles & responsibilities. Small changes to wording for Sectors.
 - Added Role of ACSA Vessel Owners and Operators.
 - Added Pre-Inspection preparations.
 - Clarification on the four ACSA Inspection types (as printed in the ACSA Newsletter)

- **Section C, Ground Tackle**
 - Changed reference to ABS Rules for building and classing steel vessels under 90 meters Part 2 Chapter 2. Added “operational test of windlass” to inspection checklist. Installed anchoring systems that do not meet the ABS standard are acceptable (grandfathered) until they no longer function or have deteriorated beyond the limit. When a grandfathered anchoring system is replaced rather than just repaired, the new anchoring system must meet ABS standards.

- **Section H - Life Saving**
 - Incorporated life raft approval standard 160.151, already found on most ACSA vessels, these rafts provide greater protection and survivability when vessels operate in harsh and cold conditions. This is due to superior design, construction and testing.

- **Annex 5**
 - Added sample ACSA Exemption Letter

Revision 1, 2009

The following is a summary of changes that were recommended and discussed at the 30 Jun 2009 ACSA meeting. The changes were finalized and published in the ACSA Implementation Guide Aug 2009.

- **Cover**
 - o Latest revision date on the bottom
- **Table of Contents**
 - o revised reflecting changes
- **Points of contact**
 - o Mr. Troy Rentz added as ACSA Program Coordinator. Mr. Ed Minor added as Sector Anchorage ACSA Inspector.
- **Program Administration**
 - o Page 11, Added Hull Exams and Expiration of Exemption Letters are “drop dead dates”. They may be completed prior to the due date but may not exceed the due date/expiration date.
 - o Procedure for requesting an exemption letter: Removed requirements that were not part of the original agreement.
 - o Page 12, Revocation of an exemption letter: Inserted procedure for appeals.
 - o Page 14, “ACSA Inspection Requirements” Clarifies that both ACSA and COC exams are to be completed on an annual basis for vessels enrolled in the program.
 - o Future exemption letters issued under the ACSA program will have endorsement blocks endorsed by the USCG representative when annual examinations are completed.
 - o Page 15, Modifications to the ACSA Examination Standards: New paragraphs state that ACSA stakeholders will be provided notice on proposed changes to ACSA examination Standards and will have 30-60 days (depending on urgency) to provide feedback.
 - o Page 17, Administration checklist was added.

- **Stability**

- Pages 18-20, processing space sump pumps: deleted language requiring sump pumps on each side of the vessel capable of dewatering at “twice” the rate of water introduced into the factory space. Now “at” the rate of water introduced into the factory space.

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

- **Dry-docking & internal exams**

- Page 22 checklist: ground tackle inspection interval changed from twice in 5 years to every 5 years. Ground tackle references are used only for purposes of sizing and arrangement.
- Page 28 Rudder and Rudder Shaft Examinations: A paragraph was added to address special considerations for Kort Nozzles and Z drives.
- Page 29, Hull audio gauging for bottom plate changed to read “at least two shots on each bottom plate at the discretion of the attending Marine Inspector”. Previously read “all bottom plating”.

- **Machinery Systems**

- Pages 35-37,: deleted wording for a maintenance schedules checklist under machinery maintenance in favor of language from the original ACSA agreement, Preventive Maintenance Program.
- Diesel propulsion machinery tests: Changed automatic shutdown on over speed to automatic shutdown on over speed (if installed).

- **Fixed firefighting equipment & arrangements**

- Moved Fire Hazard Survey and A-Class Bulkheads to “fixed firefighting equipment & arrangements” (page 39).
- Page 40 checklist, fixed firefighting equipment & arrangements: revised language for A-0 fire boundaries and non-combustible insulation.
- Page 41 Clarified fixed gas fire extinguishing system is required for spaces containing main “and auxiliary” internal combustion engine(s) of more than 50 horsepower.
- Pages 43-44, Fire Hazard Surveys and A-0 Boundaries, new additional guidance added:

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 inspections shall include a survey in all machinery spaces and other spaces where flammable and combustible materials are stored and used. At each annual inspection, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization 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.

- Page 43, Carbon dioxide detectors were expensive and hard to find approved type. Added language that the OCMI may accept an oxygen level detector as an alternative
- Page 46, Freon Detectors are only required when Freon is used in freezer hold systems and will not be required when Freon is used in small applications such as, commercial refrigerators and air conditioners.
- Page 45, Firefighting Equipment: Added each SCBA must be “positive pressure”.

- **Annex 1, Product Codes**
 - deleted “& tail removed” from description of product code 8

- **Annex 4**
 - Removed clarification message dated 20 Dec 2008 . This is a historical document. Much of the information from the message was incorporated into the Implementation Guide.

- **Annex 5**
 - Annex 5 is now Annex 4, Sample Renewal Request Letter: Removed additional language that was not part of the original agreement.

- **References**
 - Updated throughout the document