

U.S. Department
of Transportation

**United States
Coast Guard**



Commander
Eighth Coast Guard District
Hale Boggs Federal Building

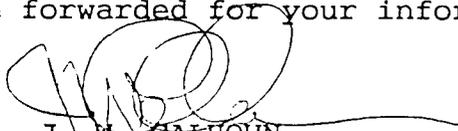
501 Magazine St.
New Orleans, LA 70130-3396
Staff Symbol: moc-1
Phone: (504) 589-6743

16711
24 September 1996

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: FIRE FIGHTING SYSTEMS FOR SUBCHAPTER T VESSELS

1. Enclosures (1) and (2) are forwarded for your information.


J. W. CALHOUN
By direction

Encl: (1) Fioreboy-Xintex Safety Systems ltr of 5 Sep 96
(2) COMDT (G-MSE-4) ltr 16714/162.029/GEN of 21 Aug 96

Dist: All Eighth District MSOs and MSU

FIREBOY-XINTEX

SAFETY SYSTEMS

September 5, 1996

Commander
U.S. Coast Guard District 8
501 Magazine St.
New Orleans, LA 70130

Dear Commander:

For many years, the Federal Register affecting Subchapter T vessels implied that only carbon dioxide (CO²) systems were acceptable in type. Later a paragraph was added permitting the use of "equivalence" when deemed appropriate by the inspecting officer. To say the least, this has created a great deal of confusion, primarily through misinformation over the years

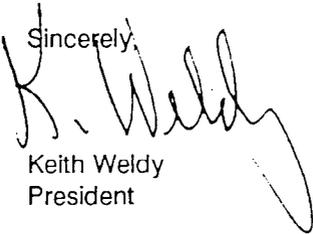
Earlier this year I asked the Chief, Life Saving & Fire Safety Standards Division to provide written clarification on this issue. As the enclosed correspondence clearly indicates from Mr. R.L. Markle of the division, an interim final rule on Subchapter T vessels was published in the Federal Register on January 10th of this year. Noting paragraph 5, should clarify any confusion or misunderstanding on the part of your inspectors regarding the use of other clean agents, particularly the new halon alternate agents, and that the new regulation eliminates the specific use of CO² as the only material permitted.

We ask that you circulate this correspondence to those individuals in your district to whom it is applicable.

Should your people have any further questions on this or any other matters in which we can provide assistance, I ask that they call me personally at the number shown on this letterhead.

This company has been manufacturing and distributing worldwide our FE-241 systems since March of 1994. Our selected agent is the most economic of all the EPA acceptable halon alternates and has proven to be widely accepted, not only in the United States but in over 11 foreign nations outside the continental U.S.

Sincerely,



Keith Weldy
President

mll/enc.

U.S. Department
of Transportation

United States
Coast Guard



Commandant
United States Coast Guard

Washington, D.C. 20593-0001
Staff Symbol: G-MSE-4
Phone: (202) 267-1444
fax (202) 267-1069

16714/162.029

16714/162.029/GEN
August 21, 1996

Mr. Keith Weldy
Convenience Marine Products, Inc.
100 Commerce Avenue, S.W.
Grands Rapids, MI 49503

Dear Mr. Weldy:

This is in reply to your letter of June 26, 1996, expressing your concern that Coast Guard inspectors believe that only CO₂ systems are permitted on Subchapter T vessels. You asked for a letter or other document which explains that your FE241 systems can be installed on Subchapter T vessels.

We have recently received several calls from the field on this subject. It appears that there are two issues to be addressed, namely the use of new extinguishing agents, and the use of pre-engineered systems on Subchapter T vessels.

Specifically, your "Fireboy" FE241 systems are covered under certificates which state that the systems are "approved for installation in unmanned engine compartments on recreational boats and certain other uninspected vessels." However, Subchapter T vessels are inspected. As you know, systems such as your "Fireboy" systems have been accepted for installation on certain small passenger vessels, i.e. inspected vessels, as well, subject to certain restrictions. This was done on a vessel-by-vessel basis after the local OCMI had reviewed the systems for suitability (such as unmanned engine compartments, compartment size, provision of manual back-up actuator, ventilation shutdown, etc.), and has reviewed the electrical installations.

The Coast Guard's intent to permit such systems on certain small passenger vessels is now reflected in the Interim Final Rule for the revision of Subchapter T, published in the Federal Register on January 10, 1996, which addresses pre-engineered fixed gas fire extinguishing systems such as the "Fireboy" type under paragraph 118.420. A copy is enclosed for your reference. However, since the latter wording does not specifically address systems approved for inspected versus uninspected vessel installation, we are drafting appropriate additional wording to clarify its meaning.

Please note that the regulations also no longer require CO₂, but instead refer to "fixed gas" systems to permit the use of clean agents in addition to CO₂.

Enclosure (2)