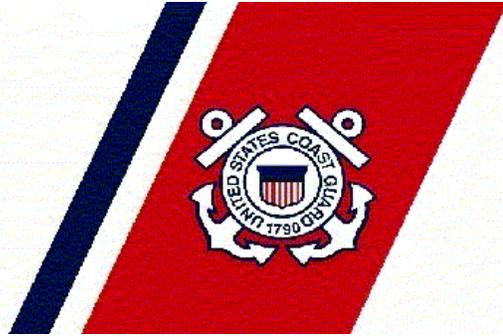


***U.S. Department of  
Homeland Security***  
***United States  
Coast Guard***



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

December 15<sup>th</sup>, 2015

On-line ACSA Guide: [fishsafewest.info](http://fishsafewest.info)

More commercial fishing vessel safety information: <http://www.fishsafe.info/>

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## Introduction

The Alternate Compliance and Safety Agreement (ACSA) is a vessel compliance program developed in 2006 for a specific and well-defined population of fish processing vessels operating in federal and state fisheries off Alaska, Washington and Oregon. The fish processing vessels currently enrolled in this program belong to three different catcher / processors (C/P) sectors: the non-pollock freezer trawler (aka Amendment 80) C/P sector, the cod freezer longline C/P sector, and the pot cod C/P sector. With few exceptions, these vessels are required by statute and regulation to meet the safety standards of vessel classification and load line. Vessels in the ACSA fleet had been in service for an average of 31 years and lacked class plan review and approval of vessel systems and machinery components. If the requirements applicable to processing vessels were strictly enforced throughout the fleet, most of these vessels could not be accepted for classification. Therefore, these vessels would likely have reduced the scope of their operation to that of fishing vessel only, which would have done little to improve safety. In order to avoid that scenario, the Alternate Compliance and Safety Agreement (ACSA) Program was developed by Coast Guard Districts 13 and 17 to provide an alternate safety regime whereby these vessels might qualify for an exemption from classification and load line requirements.

## ACSA Program Guidance

Guidance provided in this document establishes procedures and criteria by which this fleet of vessels may obtain exemptions from classification and loadline requirements under the authority of Title 46 United States Code (USC), Section 4506 and Section 5108. Since 2006, the ACSA program has been refined as lessons have been learned through the inspection of these vessels and as casualty investigations have identified recommendations to improve safety. As the program has evolved, ACSA program guidance has also been revised.

In February 2012, the Coast Guard initiated a comprehensive review of policies that govern the ACSA program. The new policy document, [CG-543 Policy Letter 12-01](#), dated February 15, 2012, supersedes previous ACSA policy and establishes the roles and responsibilities that Coast Guard Headquarters, Districts, and Sectors shall assume in the administration of the ACSA program. The policy letter states specific examination requirements for the ACSA Program shall be contained in the Guidance for the ACSA Program (ACSA Guide) and that the development of Standard Operating Procedures to manage ACSA administrative activities, consistent with the policy letter, is authorized.

This Guidance for the ACSA Program is not a substitute for applicable legal requirements, nor does it constitute a formal rulemaking. It is not intended to nor does it impose legally-binding requirements on any party. The guidance in this document establishes the procedures and criteria by which an ACSA vessel owner may obtain exemptions from classification and load line requirements.

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## **Success of the ACSA Program**

The ACSA program has facilitated major improvements to safety conditions throughout the affected C/P fleets. The hallmark of ACSA is the approach of working closely with industry stakeholders in developing elements of this program in order to prevent vessel losses and save lives. The Coast Guard will continue to exercise an aggressive leadership role in this Program while consulting with fleet stakeholders to honor their significant commitment to date.

Because the ACSA 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. Continued success of the ACSA Program depends upon a high level of coordination between the affected vessel owners, Sector Puget Sound, Sector Anchorage, and the Thirteenth and Seventeenth Coast Guard Districts.

## **Document Availability**

ACSA guidance documents are updated and maintained electronically. An electronic version of this document with active hyperlinks for each reference may be accessed by going to <http://www.uscg.mil/d13/cfvs/acsa.asp>. Copies of the ACSA Guide with references on CD can be obtained by contacting the 13<sup>th</sup> Coast Guard District Office. Previous ACSA program guidance and other historic ACSA program documents are also maintained at the 13<sup>th</sup> Coast Guard District.

## **Collection of Information**

This document and [CG-543 Policy Letter 12-01](#) 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.

## ACSA Program Points of Contact

### Scheduling of ACSA Examinations and ACSA Compliance Questions

Requests for ACSA examinations and questions regarding ACSA compliance or inspection concerns should be made to the appropriate Officer in Charge, Marine Inspection or their representative.

#### ACSA OCMI Representative for Sector Puget Sound

Mr. Robert Cuddeback [Robert.R.Cuddeback@uscg.mil](mailto:Robert.R.Cuddeback@uscg.mil) (206) 217-6187

#### ACSA OCMI Representative for Sector Anchorage

Mr. Ed Miner [Edmond.G.Miner@uscg.mil](mailto:Edmond.G.Miner@uscg.mil) (907) 428-4172

When examinations are being requested for Dutch Harbor or Kodiak, please also contact the appropriate Coast Guard Marine Safety Detachment directly as listed below:

USCG Marine Safety Detachment Dutch Harbor (907) 581-3466

USCG Marine Safety Detachment Kodiak (907) 486-5918

### ACSA Program Guidance Document

To obtain copies of the ACSA Guide on CD, or for questions regarding guidance for the ACSA program contact the Thirteenth Coast Guard District ACSA Coordinator.

Mr. Troy Rentz [Troy.Rentz@uscg.mil](mailto:Troy.Rentz@uscg.mil) (206) 220-7216

### Appeals

In accordance with [46 CFR Part 1.03-20](#), any person directly affected by a decision or action of an OCMI may after requesting reconsideration of the decision or action by the cognizant OCMI, make a formal appeal of that decision or action to the Commander of the district in which the office of the cognizant OCMI is located.

OCMI Sector Puget Sound  
Mr. John Dwyer (206) 217-6180  
24 hour number (206) 217-6002  
[John.D.Dwyer@uscg.mil](mailto:John.D.Dwyer@uscg.mil)

OCMI Sector Anchorage  
(907) 428-4200  
24 hour number (907) 428-4100

## ACSA Program Background

### Regulatory History Leading to Developing the ACSA Program

From 1991 to 2006, the vast majority of the ACSA fleet had been (incorrectly) regulated for safety purposes by the Coast Guard as “fishing vessels” instead of as “fish processing vessels.” The definitions for these two terms are provided in [46 U.S.C. 2101\(11a\)](#) and [46 U.S.C. 2101 \(11b\)](#) respectively:

- **Fishing Vessel:** “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.”
- **Fish Processing Vessel:** “A vessel that commercially prepares fish or fish products other than by gutting, decapitating, gilling, skinning, shucking, icing, freezing or brine chilling.”

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” and “fish processing vessels.” Fishing vessels are only required to meet minimal carriage requirements for lifesaving and firefighting equipment. The requirements for fish processing vessels are much more comprehensive and stringent than those required for fishing vessels. Depending on the vessel’s construction or conversion date, a fish processing vessel is required to meet the requirements of load line and classification.

- **Load Line:** A fish processing vessel built after 1974 or a vessel converted for use as a fish processing vessel after 1983 is required to meet the requirements for 46 CFR Subchapter E – Load lines.
- **Classification:** A fish processing vessel built for service as a fish processing vessel, or a vessel which undergoes a major conversion for service as a fish processing vessel after 1990 must be classed by the American Bureau of Shipping, or a similarly qualified organization.

Formal Coast Guard investigations into the loss of F/V ARCTIC ROSE in 2001 and the loss of FPV GALAXY in 2002 revealed that nearly all vessels in the ACSA fleet were operating as fish processing vessels. These investigations also revealed that the vast majority of this fleet was not in compliance with the applicable examination and classification requirements in [46 CFR 28, Subpart F](#), or load line requirements in [46 CFR Subchapter E](#).

While vessels in the ACSA fleet had been in service for an average of 31 years, the vast majority were not purpose built and had been converted, often multiple times, from other vessel types. These vessels lacked class plan review and approval of vessel systems and machinery components. If the requirements applicable to fish processing vessels were strictly enforced throughout the fleet, most of the vessels could not be accepted for

## ACSA Guidance

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classification. Therefore, these vessels would likely have to reduce the scope of their operation to that of a fishing vessel producing Head and Gut (H & G) products only, operating with less economic efficiency, and would have done little to improve safety. In order to avoid that scenario, the ACSA Program was developed by Coast Guard Districts 13 and 17 to provide an alternate safety regime whereby these vessels might qualify for exemption from classification and load line requirements.

### **Discussion of Exemption Authority**

The exemption authority in [46 CFR 28.60](#) is based on [46 USC 4506](#) and states that the District Commander may grant exemptions, provided that (1) good cause exists for granting an exemption; and (2) the safety of the vessel and those on board will not be adversely affected. Therefore, the District Commander may exempt a fish processing vessel from classification requirements found in [46 CFR 28.720](#).

Load line requirements are established in [46 USC 5101](#). Because ACSA vessels engage in catching fish, they meet the definition of "fishing vessel" under the International Convention on Load Lines, 1966, and are not subject to international load line requirements. In accordance with [46 U.S.C. 5108\(a\)\(1\)](#), a vessel entitled to an exemption under an international agreement may also be granted an exemption under U.S. law. Therefore, these vessels may be exempted from domestic voyage load line requirements, pursuant to [46 CFR 42.03-30](#). The ACSA Program allows for the District Commander to grant this exemption and an exemption for classification in a single letter of exemption.

Because the majority of vessels within the ACSA program conduct their primary shipyard and vessel inspection activities in the Sector Puget Sound area of responsibility, the Thirteenth District ACSA Program Coordinator will process exemption letters for all ACSA vessels.

## ACSA Safety Standards and Permitted Processing Activities

The Coast Guard and the affected members of the Amendment 80 sector, the cod freezer longline sector, and the pot cod C/P sector have gone to great lengths to develop a regime that will provide a level of safety appropriate for this fleet of vessels. The ACSA program focuses on the following components of vessel safety:

Vessel Stability	Drydock & Internal Structural Exams	Tail Shaft & Rudder Exams	Watertight & Weathertight Integrity
Propulsion & Electrical Generation Machinery	Vital Piping Systems	Life Saving Equipment & Arrangements	Fire Prevention, Fire Detection, & Fire Fighting Equipment
Emergency Training, Drills and Response	Navigation Safety	Emergency Communications	

**Table 1: General ACSA Safety Requirements**

Relative comparison of Load Line and ACSA requirements has been conducted by the Coast Guard and is provided in Annex 6. In 2008, the Deputy Commandant for Operations determined that a vessel in compliance with ACSA demonstrates a level of safety appropriate for this fleet when all ACSA program elements are met. Publication of the [CG-543 12-01 Policy letter](#) further supports this determination.

### What Fish Processing Activities Are Permitted Under ACSA?

As established in the previous sections, vessels within the ACSA program have been determined by the Coast Guard to be “fish processing vessels” based upon the fish products which are produced on board. A critical component of the ACSA Program is that the Coast Guard has defined (with significant input from affected fishing industry associations, naval architects, and other fishing industry leadership), those individual fish products which meet the statutory definitions of “fish processing.” These specific fish products codes are described in detail by the National Marine Fisheries Service in [50 CFR 679, Table 1a](#).

By determining which NMFS Processing fish products listed in [50 CFR 679, Table 1a](#) meet the statutory definition of fish processing, there is full transparency for ACSA vessel owners, operators, and the Coast Guard as to whether a vessel is operating as a fish processing vessel.

The table on the following page is a summary of products, based upon [50 CFR 679, Table 1a](#), which are produced on fish processing vessels which operate in the North Pacific federal fisheries. This table categories those products into three general categories; whether that product is allowed to be produced on a fishing vessel, ACSA vessel, or fish processing vessel. A comprehensive summary of these fish products is found in Annex 1 of this document.

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Fish Product Name	Column A Head and Gut Fish Products Allowed for Fishing Vessels	Column B Fish Processing Products Allowed for ACSA Vessels	Column C Fish Processing Products Allowed on Classed/Loadlined or Grandfathered Vessels
Whole Fish (for) Meal	X	X	X
Bled Only	X	X	X
Bled Fish destined for Meal	X	X	X
Gutted, Head On	X	X	X
Gutted, Head Off	X	X	X
Head & Gutted with Roe	X	X	X
Headed & Gutted, Western Cut	X	X	X
Headed & Gutted, Eastern Cut	X	X	X
Wings	X	X	X
Mantles, Octopus or Squid	X	X	X
Headed & Gutted, Tail Removed		X	X
Kirimi (Steak)		X	X
Roe		X	X
Pectoral Girdle		X	X
Heads		X	X
Chins		X	X
Cheeks		X	X
Milt		X	X
Stomachs		X	X
Salted and Split			X
Belly Flaps			X
Fillets with Skin & Ribs			X
Fillets with Skin, No Ribs			X
Fillets, Skinless / Boneless			X
Fillets, Deep Skin			X
Surimi			X
Minced			X
Fish Meal			X
Fish Oil			X
Butterfly, No Backbone			X
Bones			X

**Table (2): Summary of Fish Products**

- A “fishing vessel” may only produce those products listed in Column A.
- An “ACSA compliant” vessel may only produce those products listed in Column B.
- A fully classed and loadlined fish processing a vessel, or a fish processing vessel that is otherwise grandfathered from the requirements from classification and loadline, may produce those products found in Column C.

### Safety Sub-Categories of Vessels

With the development of the ACSA program, vessels within the Amendment 80, the cod freezer longline CP sector, and the pot cod CP sector generally fall into one of five sub-categories for the purposes of safety regulations:

- Fishing Vessel (H & G Products Only): A vessel under this safety regime is only required to meet safety standards [46 CFR 28 subparts A-C](#) standards. These fishing vessels may only produce those products found in Column A.

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- **Grandfathered Fish Processing Vessels:** A vessel under this safety regime is only required to meet safety standards [46 CFR 28](#) and is also required to be examined by a USCG third party surveyor every two years. These fish processing vessels have no processing limitation and may produce any product described in Column C.
- **ACSA Compliant (requiring Classification and Load Line exemption):** These vessels are neither classed or loadlined, but they produce fish products which classify them as “fish processing vessels.” To continue to be allowed to produce fish products in Column B, these vessels must be in compliance with the ACSA program and possess aboard an exemption letter exempting the vessel from both classification and load line.
- **ACSA Compliant + Load Line:** These fish processing vessels are not classed, but do have a current load line. They produce fish products which classify them as “fish processing vessels.” To continue to be allowed to produce fish products in Column B, these vessels must be in compliance with the ACSA program, must maintain compliance with load line requirements and possess aboard an exemption letter exempting the vessel from classification.
- **Classification + Loadline:** These fish processing vessels are fully classed and load lined and are not required to be enrolled in ACSA. There are no limits on the products that can be made by these vessels.

## Roles and Responsibilities within the ACSA Program

It is the Coast Guard’s aim to provide a high degree of engagement and oversight of the ACSA program and will assume the lead for compliance with ACSA provisions. The following responsibilities within the Coast Guard are established by [CG-543 Policy Letter 12-01](#), Alternate Compliance and Safety Agreement (ACSA) Program.

**Coast Guard Headquarters:** Headquarters will review the Guidance for the ACSA Program and work with Districts to ensure the ACSA Program is consistent with Commandant Policies and regulatory changes.

**Coast Guard District Thirteen:** The Thirteenth District ACSA Coordinator is responsible for processing exemption requests and maintaining ACSA program documents, including the online version of the ACSA Guide.

- **Issuance of Exemption Letters:** The District Commander may continue to issue a letter of exemption, valid for up to two years, to allow a vessel enrolled in the ACSA program to continue operating as a fish processing vessel. A letter of exemption shall only be granted where it is determined that (1) Good cause exists for granting the exemption; and (2) The safety of the vessel and those on board will not be adversely affected. Prior to being granted an exemption by the District Commander, the Officer in Charge of Marine Inspection will submit a memo to the District Commander verifying that the vessel owner has completed the all required examinations for enrollment into the ACSA program, and that all activities related

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to the ACSA program are properly documented.

- Guidance for the ACSA Program: Specific examination requirements for the ACSA Program shall be contained in the ACSA Guide. Sectors, District Commanders and ACSA Coordinators shall ensure that the ACSA Guide is updated as necessary to establish any new requirements that are needed to provide for a continued and an appropriate level of safety. This document shall be the primary source of information for ACSA examination and safety requirements, policy determinations and clarifications, inspection procedures and other criteria regarding obtaining exemptions from classification and load line. Maintaining an online version of this document shall be the responsibility of the Thirteenth District ACSA Program Coordinator.
- Fish Product Guide: The ACSA Guide shall include a list of fish products which are considered to be “fish processing.” The product codes listed by the National Marine Fisheries Service [50 CFR 679, Table 1a](#) will be used in this determination. If industry practices change or if questions arise regarding what operations qualify a vessel as a fish processing vessel, the OCMI will evaluate the operation and forward a recommendation to the Commandant (CG-PCV-3), via the District Commander, for a final determination.
- Changes to Guidance for the ACSA Program: During the first five years of the ACSA program, changes were made to the ACSA Guidance document on an annual basis to take into account lessons learned from the previous year’s examinations or to take into account the findings of marine casualty investigations. Following the 2012 revision, proposed changes to the document should be rare. If a change request is proposed, it should be of sufficient gravity and importance to necessitate fleet wide changes in policy to provide for a continued and appropriate level of safety. While proposed changes may be initiated by vessel owners, Sector, or District personnel, all such change requests must be thoroughly vetted locally prior to submission to CG-CVC-3. Vetting will be coordinated by the 13<sup>th</sup> District ACSA Coordinator and include input from vessel owners (typically represented by industry associations), the 17<sup>th</sup> Coast Guard District and the affected OCMI/Sector offices. ). Recommended changes will then be proposed at the Annual ACSA Meeting. If there is concurrence to change the ACSA Guidance following the annual meeting, a memo shall be drafted and routed from the 13<sup>th</sup> District ACSA Coordinator to Coast Guard Headquarters CG-CVC thru the 17<sup>th</sup> District Fishing Vessel Safety Coordinator and the Pacific Area Fishing Vessel Safety Coordinator. CG-CVC will retain final review and approval of changes made to the ACSA Guidance document.
- The ACSA Vessel Status spreadsheet shall be maintained by the ACSA Coordinator and distributed to Sector Puget Sound, D17, and Sector Anchorage.

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**Sectors:** ACSA is a vessel compliance program. Consistent with other Coast Guard vessel compliance programs, operational decision making, program execution, enforcement, and day to day management of the program will be maximized at the OCMI / Sector level. Specifically, the OCMI shall:

- Receive and process requests for ACSA examinations
- Conduct ACSA examinations
- Make appropriate entries into MISLE and process ACSA case work.
- The OCMI representative shall forward requests to the District Commander for exemptions from load line and classification.
- Maintain ACSA vessel files.
- Initiate and provide input as necessary to District staff for changes to ACSA program requirements.
- Maintain liaison with the Marine Safety Center, classification societies, naval architects, fishing association and industry leaders, fishery managers, vessel owners and operators.
- Coordinate activities and passing of information between Sectors.
- Conduct marine casualty investigations and enforcement actions as necessary with ACSA vessels in accordance with the marine safety manual.
- Ensure that properly qualified and trained marine inspectors are assigned to conduct ACSA examinations, including verification of emergency drills.

### **ACSA Vessel Owners**

Early, frequent and clear lines of communication between the vessel owner and the Coast Guard inspector will alleviate most issues which arise during the course of an ACSA examination. It is the vessel owner's responsibility to ensure requests for ACSA examinations are made to the Coast Guard in a timely manner. It is also the vessel owner's responsibility to ensure that the vessel is ready for Coast Guard examination.

ACSA vessel owners submit a written request for exemption to the appropriate district office thru the OCMI in the zone where the owner intends to have the ACSA Renewal Exam completed, see Enclosure (1). Ensure a copy of the request is e-mailed to [troy.rentz@uscg.mil](mailto:troy.rentz@uscg.mil) to initiate tracking.

### **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.

## Section A – Administration

### ACSA Exemption and Examination Process

**General:** A vessel’s acceptance into the ACSA program is at the discretion of the District Commander, and a vessel’s status in the program is contingent upon compliance with ACSA program requirements. Because the majority of ACSA exam activity occurs in Sector Puget Sound’s AOR, the Thirteenth District Commander will serve as the “exempting authority” for ACSA vessels and issue ACSA Exemption Letters.

**Definitions:**

ACSA Exemption Exams: These exams are conducted to ensure compliance with all ACSA requirements (including drydock, hull, internal structural exams, machinery and stability requirements), in addition to other fishing industry vessel requirements (vessel safety, performance of drills, pollution prevention, licensing, etc.) ACSA Exemption Exams are conducted every two years and result in the issuance of an ACSA Exemption Letter and a fishing vessel safety decal.

ACSA Mid-Period Exams: Similar to a re-inspection of an inspected vessel, ACSA Annual exams are intended to verify compliance with ACSA requirements, but not to the extent they were examined during the Exemption Exam. Particular emphasis during the Annual Exam should be placed upon fire fighting and life saving equipment, watertight integrity, performance of safety drills, and inspection items which are due for examination. The Mid-Period Exam is to be conducted within 60 days before or after the ACSA Exemption Exam anniversary date. This examination results in the annual endorsement of the ACSA Exemption letter by the attending inspector.

Drydock Exams: Drydock means hauling out a vessel or placing a vessel in a drydock for an examination of all accessible parts of the vessel’s underwater body and all thru-hull fittings and appurtenances. Consistent with inspected vessels, these exams shall occur twice in five years, not to exceed three years.

Internal Structural Exams: This exam consists of a complete internal examination of the vessel’s main strength members, including the major internal framing, hull plating, voids, and ballast, cargo, and fuel oil tanks. Consistent with inspected vessels, these exams shall occur twice in five years, not to exceed three years.

Deficiency Exams: Examination visits conducted to clear requirements.

Stability Oversight Exams: Conducted once every five years as needed for deadweight surveys and inclining experiments. This five year interval may be adjusted based upon guidance provided by the Coast Guard Marine Safety Center.

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**Certificate of Compliance:** Fish processing vessels are required by laws and regulations to carry a Certificate of Compliance in accordance with [46 CFR Part 28.710](#). A fishing vessel safety decal shall be issued to accompany the Certificate of Compliance.

### **Procedures for Submitting Exemption Requests**

#### **Current ACSA Vessels:**

30 days prior to the expiration date of the current ACSA letter, ACSA vessel owners shall submit a written request for exemption from classification and loadline to the appropriate district office thru the OCMI in the zone where the owner intends to have the ACSA Renewal Exam completed. For Washington it is OCMI Puget Sound, For Ketchikan it is OCMI Juneau and for Western Alaska it is OCMI Anchorage see Annex 4 for sample request letter and addresses.

The OCMI shall evaluate whether the request for exemption is appropriate. If the vessel is currently enrolled in ACSA and is in good standing, the appropriate ACSA examinations shall be scheduled. If there is a question or concern that may lead to the OCMI not recommending the vessel for future continuance in the ACSA program, the OCMI shall notify the district prevention office.

**New Entrants to the ACSA Program:** The owner of a fish processing vessel that is not currently in ACSA and does not have valid classification or load line certification may apply for an exemption from classification and load line requirements subject to certain conditions. Under provisions of [46 USC 4503\(d\)\(5\)](#), a fish processing vessel (that was classed as a fish processing vessel) before July 1, 2012 shall remain in class. If the vessel in question had not previously been classed (or load lined), the request for exemption may continue.

Exemptions are not automatically granted. In requesting an exemption, the vessel owner has the burden of proof to demonstrate that (1) Good cause exists for granting the exemption; and (2) The safety of the vessel and those on board will not be adversely affected. Requests for new entrants in the ACSA program shall be submitted to the 13<sup>th</sup> Coast Guard District .

Fish processing vessel owners requesting an initial exemption may only operate as an H & G vessel (produce those products provided in Column A of Table (1)) 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.

### **Conducting Vessel Examinations and Requirements for Deficiency Lists**

Once scheduled, the OCMC shall assign qualified marine inspectors (drydock, hull, machinery as appropriate) to conduct all exams the ACSA vessel requires to receive the requested exemptions from classification and load line. The OCMC shall ensure the following administrative activities are completed following the vessel examination.

- All deficiencies are documented with appropriate completion dates and entered into MISLE. A copy of these deficiencies will be provided to the vessel representative (master, engineer, or port engineer) within 5 working days of the inspection activity. Original deficiency lists will be kept with the case file.
- Complete associated MISLE activities within the time frames specified in the MISLE Guide. When a vessel is expected to follow-up on deficiencies in another OCMC zone, effort should be made to expedite MISLE entry.
- If an ACSA vessel is transiting to another OCMC zone with outstanding deficiencies, scanned copies of all deficiency lists generated shall be emailed to the appropriate department / division / branch at the receiving OCMC zone as soon as possible to facilitate scheduling of follow-up examination activities.

### **OCMC Requests for Exemption Letters from the District Commander**

The District Commander is the “exempting authority” for ACSA vessels. In order to keep the process uniform and have a consistent point of contact D13 issues the ACSA Exemption Letters for both D13 and D17 thru the ACSA Coordinator. Upon completion of the appropriate examinations necessary to obtain an exemption letter, The cognizant OCMC submits a memo to D13(p) or if in Alaska via D17(p) recommending exemption and certifies the vessel substantially complies with ACSA.

If the OCMC has found the vessel to be in substantial compliance the OCMC may permit the vessel to operate for an additional 60 days from the date of the memo until the Exemption Letter is signed by the District Commander. A copy of the memo shall be provided to the vessel owner to present to Boarding Teams and other concerned parties as proof of compliance.

A vessel may have outstanding deficiencies and still be considered to be “in substantial compliance” with the ACSA program. The attending marine inspector shall exercise their sound judgment, experience, and consider all relevant factors to ensure that outstanding deficiencies may be completed within the time frame allowed without posing undue risk to the vessel or its crew.

D13(dp) shall mail the signed exemption letter to the vessel owner and scan the signed exemption letter into the Coast Guard MISLE database.

### **Appeals**

Owners have the right to appeal requirements issued by the attending USCG inspector to the Officer in Charge, Marine Inspection (OCMI) listed in the contacts section. Afterwards, further appeal may be made to the District Commander in accordance with [46 CFR 1.03-20](#). Owners also have the right to continue to appeal the decision of the District Commander to Commandant CG-PCV-3, in accordance with [46 CFR 1.03-25](#).

### **Dockside and At-Sea Enforcement Options**

#### **Enforcement Posture for ACSA Related Items**

Due to the unique relationship that ACSA vessels have with the Coast Guard, OCMI may enforce non-compliance with ACSA specific requirements in a manner similar to the way a non-compliant inspected vessel would be held accountable. These options include issuance of a no-sail CG-835 or pulling of an ACSA exemption letter. Note: As with pulling a COI, removing or pulling an ACSA vessel's exemption letter should be considered a last resort and used for only the most serious and egregious non-compliance matters.

#### **Enforcement Posture for Items not Related to ACSA**

As ACSA vessels are commercial fishing industry vessels, use of well-established OCMI / COTP authorities such as vessel termination authority found in [46 CFR Part 28.65](#) and Captain of the Port Authority found [33 CFR 160.111](#) should be considered the primary option for compelling compliance with items required by [46 CFR Part 28](#) or when a vessel has an especially hazardous condition on board.

#### **Notifications of Operational Controls Imposed on ACSA Vessels**

The OCMI shall notify appropriate Coast Guard offices (Thirteenth District, Seventeenth District, Sector Puget Sound, Sector Anchorage, etc.) when an ACSA vessel is either terminated, issued a Captain of the Port Order, issued a no-sail CG-835, or has its Exemption Letter pulled.

#### **At-Sea Boarding Guidance**

In addition to other locally derived at-sea enforcement policy decisions (examination of Big-8 Safety Items), at – sea boarding teams should treat ACSA vessels like other fish processing vessels that are not classed or are not load lined. Other fish processing vessels not required to have a classification survey or load line certificate should possess a current Certificate of Compliance and current fishing vessel dockside exam decal. ACSA vessels should possess the same documents, except that the ACSA Exemption Letter issued by the Thirteenth District Commander substitutes as a Certificate of Compliance. The Exemption Letter should have annual endorsements recorded. Endorsement dates need to fall within a two month window before or after the anniversary date of the ACSA Exemption Letter.

## ACSA Guidance

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<b>A – Administration</b>	<b>Interval</b>	<b>References</b>
<p><b>○ 1. ACSA Exemption Letter</b></p> <ul style="list-style-type: none"> <li><b>□ ACSA Exemption Renewal Exam</b> <ul style="list-style-type: none"> <li>— Confirm a renewal request letter is on file with Sector</li> <li>— USCG Examiner endorses Renewal Examination block on existing letter.</li> </ul> </li>   <li><b>□ ACSA Mid-Period Exam</b> <ul style="list-style-type: none"> <li>— Confirm the ACSA Exemption Letter is on board and valid.</li> <li>— USCG Examiner endorses ACSA Mid-Period Examination block.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Compliance Matrix Annex 2</a>
<p><b>○ 2. Commercial Fishing Vessel Decal and Certificate of Compliance (COC).</b></p> <ul style="list-style-type: none"> <li><b>□ If conducted by a 3rd party organization</b> <ul style="list-style-type: none"> <li>— Confirm a valid COC was issued within the past 2 years.</li> <li>— Confirm a valid Commercial Fishing Vessel Decal was issued within the past 2 years.</li> </ul> </li> <li><b>□ If conducted by the Coast Guard</b> <ul style="list-style-type: none"> <li>— Exemption letter will be endorsed as satisfying the requirement for completion of the COC Exam.</li> <li>— Applicable items listed in the CFIVS Exam Book (CG-5587) and its supplement (CG-5587B) examined as part of each ACSA Exemption Renewal and Mid-Period Exam.</li> </ul> </li> </ul>	Annually	<a href="#">CG-5587</a> <a href="#">CG-5587B</a>
<p><b>○ 3. Valid Load Line Certificate?    ___Yes    ___No</b></p> <p><b>□ Issued by</b> _____</p> <p><b>Issue date</b> _____ <b>Exp.</b> _____</p> <p><b>Annual endorsement date</b> _____</p>	Annually	<a href="#">ACSA Guide “Applicability”</a>

## **Additional Inspection Notes and Policy Discussion**

- 1. Exemption Letter.** An ACSA vessel is issued an ACSA Exemption Letter that is valid for no more than two years from the date of issue. This letter states the date the vessel completed the ACSA examination and the expiration date of the exemption. A fishing vessel safety decal shall also be issued at this time, and will be issued for a period of two years.

  - The ACSA mid-period examination must be completed 60 days either side of the mid- period due date listed in the letter. When completed, the exemption letter will be endorsed confirming the completion of this mid-period examination.
- 2. Certificate of Compliance Examination.** Part of the mid-period examination is to examine annual Certificate of Compliance examination (Fishing Vessel Safety and pollution requirements), and when complete, the exemption letter will be endorsed confirming the completion of this examination.
- 3. Load Line Certificate.** Ensure the certificate has been endorsed by the classification society surveyor and ensure a copy is made and scanned into MISLE.
- 4. Expired Exemption Letters.** When an Exemption Letter Expires or when a vessel fails to comply with the conditions of the exemption (e.g. failed to complete the required dry-dock exam) the Exemption is no longer valid. The vessel is not authorized to operate as a fish processing vessel producing products listed as “beyond minimal processing” in Annex (1). If a vessel engages in processing without a valid Classification Certificate or exemption, the vessel's operations may be terminated and the owner subject to a fine.
- 5. Substantial Compliance.** Certain deficiencies may pose an unacceptable risk to a vessel. For example discrepancies in vessel stability and water tightness. These discrepancies may be written with a requirement to clear them prior to departure, prior to receiving credit for the dry-dock or prior to conducting processing aboard the vessel. When these deficiencies go uncorrected beyond the due date the vessel does not substantially comply with ACSA and the Exemption(s) under the agreement are no longer valid.
- 6. Lay-up.** ACSA Vessel Owners may request a vessel remain in the ACSA program in lay-up status when the vessel is expected to remain inactive past examination due dates. See Annex 7 for an example Lay-up request. While the vessel is in lay-up status it may not be placed into service until all exams are complete and the vessel is returned to service as a catcher-processor or removed from the ACSA program.

## ACSA Guidance

<b>B - Vessel Stability</b>	<b>Interval</b>	<b>References</b>
<ul style="list-style-type: none"> <li>○ <b>1. Stability Instructions</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Examine Stability Letter and Addendum</li> <li><input type="checkbox"/> Identifies the location of loading mark and draft marks</li> <li><input type="checkbox"/> Ensure master and engineer are familiar with stability instructions and addendum</li> </ul> </li> </ul>	Annually	<a href="#">46 CFR 28.530</a>
<ul style="list-style-type: none"> <li>○ <b>2. Stability Addendum.</b> Examine stability addendum or LL-11D (on vessels with a load line) to ensure it identifies the following:           <ul style="list-style-type: none"> <li><input type="checkbox"/> Watertight bulkheads</li> <li><input type="checkbox"/> Watertight closures (location, size &amp; type)</li> <li><input type="checkbox"/> Weather-tight closures (location, size &amp; type)</li> <li><input type="checkbox"/> Coamings and vents (heights and locations)</li> <li><input type="checkbox"/> Automatic closure devices, operating stations for doors, hatches, scuttles, chutes, tank vents.</li> <li><input type="checkbox"/> Ventilation devices located on the main deck or above</li> <li><input type="checkbox"/> Sea valves: location, size, type and remote operating stations.</li> <li><input type="checkbox"/> Size and number of freeing ports and drain lines provided.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide Section B</a>  or LL-11D
<ul style="list-style-type: none"> <li>○ <b>3. 5 Year Stability Review</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Not greater than 5 years since last inclining or verification of stability by deadweight survey.</li> <li><input type="checkbox"/> Stability letter reviewed by Marine Safety Center</li> </ul> </li> </ul>	Every 5 Years	<a href="#">MSC Guidance</a>
<ul style="list-style-type: none"> <li>○ <b>4. Factory Sump Pumps</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 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.</li> <li><input type="checkbox"/> If no sump pumps are used because freeing ports and /or scuppers are used, this must be listed in the stability addendum.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide Section B</a>

### General Policy Discussion

**General Requirements for this Section.** ACSA vessels must follow vessel stability requirements as provided in 46 CFR 28.500. Furthermore, stability addendums as described below must be developed and maintained as described in paragraphs (2) and (4) of this section. ACSA stability reports are required to be reviewed every five years by the Coast Guard Marine Safety Center as detailed below.

### Inspection Notes

**1. Stability Instructions.** ACSA vessel stability must meet the requirements of [46 CFR 28.530](#). Additionally, the 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

## ACSA Guidance

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checked prior to departure. Copies of Stability Instructions (including Addendums) and Inclining/Deadweight Survey will be entered in MISLE and hard copies will be maintained by to Sector Puget Sound as the custodian of vessel files.

**2. Stability Addendum.** An addendum to the above Stability Instructions shall be prepared. 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. The stability addendum will include:

- A list of all watertight bulkheads in the hull structure including size and type of watertight closures in each such bulkhead.
- 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.
- Tabulation of through-hull fittings including location, size, type, and remote operators, if any.

**3. Five Year Stability Review.** Within five years of entering the ACSA program, vessels were required to complete lightship determination 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 test procedures should be prepared in accordance with [MSC Plan Review Guidelines H2-01](#) and be submitted to MSC at least two weeks prior to the test date for approval, when applicable. MSC Guidelines for commercial fishing vessel stability should be followed. The final decision pertaining to the type of test required will be at the discretion of the cognizant OCMI.

**4. Processing space sump pumps.** 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.

Unique arrangements regarding the capacity or number of sump pumps may be permitted at the discretion of the OCMI. For example, if no sump pumps are used (e.g. freeing ports and/or scuppers only), this shall be identified in the vessel's stability addendum, and information shall be provided as to the number and size of the freeing ports.

ACSA Guidance

<b>C - Drydock and Internal Structural Exam</b>	<b>Interval</b>	<b>References</b>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>1. Propeller(s)</b></li> <li><input type="radio"/> <b>2. Stern bushing(s)</b></li> <li><input type="radio"/> <b>3. Sea connections</b></li> <li><input type="radio"/> <b>4. Weldments.</b> Visually examine condition of all welds for (1)Washed out welds, (2)Cracking, (3)Excess pitting/corrosion</li> <li><input type="radio"/> <b>5. Shell Plating.</b> Visually examine the condition of all shell plating which constitutes the watertight envelope.</li> </ul>	Twice in 5 years not to exceed a 3 year interval	<a href="#">46 CFR 61.20-5(a)</a>  <a href="#">NVIC 7-68</a>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>6. Sea Chests</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Open for examination</li> <li><input type="checkbox"/> Check all welds, plating and thru -hull penetrations</li> </ul> </li> </ul>	5 yrs	<a href="#">46 CFR61.20-5</a>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>7. Sea and Overboard Valves</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> 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</li> <li><input type="checkbox"/> Valves located as close as possible to the side shell plating</li> <li><input type="checkbox"/> Valves are steel, bronze or other approved material</li> </ul> </li> </ul>	5 yrs	<a href="#">46 CFR61.20-5</a>  <a href="#">ABS rules 4-4-2/19</a>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>8. Sea Strainers.</b> Open for examination and clean</li> </ul>	5 yrs	<a href="#">46CFR 61.20-5(b)</a>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>9. Valves for emergency bilge suction</b> (if equipped), open for examination and examined</li> </ul>	5 yrs	<a href="#">46 CFR91.43-1</a>
<ul style="list-style-type: none"> <li><input type="radio"/> <b>10. Internal Examination of Integral Fuel Oil Tanks</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> List or diagram of fuel tanks examined.</li> <li><input type="checkbox"/> _____</li> </ul> </li> </ul>	5 yrs	<a href="#">46 CFR91.43-1</a>

ACSA Guidance

<p>○ <b>11. Examination of internal spaces</b></p> <p><input type="checkbox"/> List or diagram of spaces examined provided.</p> <p><input type="checkbox"/> _____</p>	<p>Twice in 5 years not to exceed a 3 year interval</p>	<p><a href="#">46CFR 91.40-3a</a></p>
<p>○ <b>12. Keel Coolers</b></p> <p><input type="checkbox"/> Item</p> <p><input type="checkbox"/> Item</p> <p><input type="checkbox"/> Item</p> <p><input type="checkbox"/> Item</p>	<p>Twice in 5 years not to exceed a 3 year interval</p>	
<p>○ <b>13. Ground Tackle</b></p> <p><input type="checkbox"/> Ensure suitable for vessel</p> <p><input type="checkbox"/> Anchors and chain / wire rope ranged</p> <p><input type="checkbox"/> Operational test of windless and chain locker pumping arrangements.</p> <p><input type="checkbox"/> Chain to be gauged; Maximum wastage allowed is 12%</p>	<p>5 yrs</p>	<p><a href="#">ABS Rules Part 2, Chap. 2</a></p>
<p>○ <b>14. Hull Markings</b></p> <p><input type="checkbox"/> Examine fore and aft draft marks</p> <p><input type="checkbox"/> Examine ACSA Maximum Loading Marks</p> <p>— Horizontal white mark 12 inches long, 1 inch wide</p> <p>— Permanently marked by weld bead, punch marks or flat bar</p> <p>— Location as identified in the addendum to the stability letter</p> <p>— Port and starboard sides</p> <p><input type="checkbox"/> Examine Maximum Loading marks</p>	<p>Twice in 5 years not to exceed a 3 year interval</p>	<p><a href="#">46CFR 97.40-10</a></p>

## General Policy Discussion

**General Requirements for this Section.** ACSA vessel owners or operators are responsible for preparing the hull, through-hull fittings, shaft(s), propeller(s), rudder, tanks, voids, and other confined spaces, as appropriate, for required hull examinations and internal structural examination (ISE). This includes cleaning, disassembling, gas freeing, testing for toxicity, and ventilating.

Owners will notify the local OCMI 30 days in advance of all scheduled dry-docking. The fully qualified marine inspector should normally conduct the examinations in the company of a vessel representative (port engineer, ship's officer, etc.), as well as any other interested parties or agencies (a classification society surveyor, an insurance underwriter, a shipyard representative, etc.). Whether accomplished in one visit or over a period of time, each particular exam should consist of a careful inspection of all accessible parts of the vessel's structure, fittings, and appurtenances, as appropriate.

- **Deficiencies.** Deficiencies should be called to the attention of the owner's representative at once. When deemed necessary, the inspector should note requirements for correction of deficiencies on Form CG-835. Discussion of the vessel's condition and alternate methods of repair should result in adequate repairs with the least disagreement over methods and extent of repair.
- **Repairs.** Standards for repairs to the hull, framing, and other structural members are found Navigation and Vessel Inspection Circular [\(NVIC\) 7-68](#), and shall be completed consistent with principles of good marine practice.
- **Replacement or Additions.** For replacement or addition of structural members, ABS rules for Building and Classing Steel Vessels Under 90 Meters will be utilized as the accepted standard for all issues related to the watertight envelope and subdivision.

The marine inspector must be satisfied that the vessel can operate safely. In cases of severe damage, controversy, or unusual circumstances beyond the inspector's experience, the OCMI should be notified immediately.

**Drydock Intervals.** The ACSA program is intended to have enrolled vessels meet alternate standards for classification and loadline, especially as it relates to the inspection of the hull and structure of the watertight envelop.

- **Vessels without Load Lines:** 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.
- **Vessels with Load Lines:** Under longstanding classification rules, vessels which are both classed and loadlined are required to be drydocked and have internal structural exams (ISE) conducted twice in any 5 year period with a maximum interval of 3

## ACSA Guidance

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years. As such, ACSA vessels with a valid loadline certificate must meet the same inspection interval for drydocking and ISE as required for classed vessels.

- Coordination with Class: The OCMI will make every effort to coordinate closely with class surveyors for all drydockings and internal structural examinations of loadlined vessels enrolled in the ACSA program.

**Dry Dock Extension Requests.** Dry-dock extension requests may be granted by the cognizant Officer In-Charge Marine Inspection (OCMI) on a case-by case basis for circumstances beyond the owner's control and will be granted in only the most unusual of circumstances. Examples of unusual circumstances are the sudden unavailability of drydock space or circumstances clearly beyond the owner's control. *Singularly, financial hardship is not a valid reason for granting a drydock extension.*

To make a drydock request, the vessel owner must submit a written request (or email) to the OCMI attesting that the vessel is in suitable condition for operation during the period of the extension. The request must include an assessment of the hull, machinery, tail-shaft(s), steering and thru-hull fittings.

The OCMI will also consider the following in making a determination:

- Historical condition of the hull during past haul-outs
- Outstanding deficiencies related to the hull, tail-shaft, or thru-hull fittings.
- Recent marine casualty events (groundings, etc) involving the hull, tail-shaft or thru-hull fittings.
- Whether the vessel has been operating in ice.
- Whether a marine inspector shall attend the vessel to ascertain the vessel's condition.
  - At a minimum, a marine inspector shall interview the chief engineer and/or the master, to obtain their opinions on the condition of the vessel's hull, tailshaft(s), and associated machinery.

For extension requests greater than 60 days, an underwater inspection report is required.

The OCMI may grant a drydock extension for 150 days.

### **Notifications to OCMI regarding Emergency Hull Repairs**

The vessel owner will notify the local OCMI as soon as possible for any unplanned or emergency drydockings.

## Inspection Notes

**1-6. None**

**7. Sea and Overboard Valves.** Valves of ordinary cast iron and wafer type valves 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.

**8. None**

**9. None**

**10. Internal Structural Examination of Integral Fuel Tanks.** Examine side shell, bulkhead, tank tops, frames, welds for wastage and damage. The number of tanks that must be opened for examination is determined by [46 CFR 91.43-1](#).

**11. Internal Structural Examination.** Examine side shell, bulkhead, tank tops, frames, welds for wastage and damage.

**12. Keel Coolers.** To be developed.

**13. Ground Tackle.** Anchors and chain are to be ranged, examined and the required complement and condition confirmed. The chain locker, hawse pipes, chain stoppers and anchor windless are to be examined. Pumping arrangements of the chain locker shall operationally tested.

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

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 for ground tackle.

**14. Hull Markings.** Maximum loading mark location is provided via the stability addendum and is described in terms of mid-length location by frame number and distance (in inches) from the molded main deck line to the bottom mark.

The loading mark amidship shall be examined. 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, punch marks or flat bar.

D- Hull thickness gauging	Interval	References
<ul style="list-style-type: none"> <li>○ <b>1. Periodic gauging requirement</b> <ul style="list-style-type: none"> <li>❑ Obtain copy of gauging report</li> <li>❑ Gaugings shall include, but not limited to the following:                             <ul style="list-style-type: none"> <li>— Three transverse sections in the midship 0.5L</li> <li>— Internals of the fore and after saltwater peak tanks</li> <li>— Wind and water strakes, port and stbd, full length</li> <li>— All exposed main deck plating &amp; superstructure deck</li> <li>— Two shots on each bottom plate at the discretion of the attending Marine Inspector</li> <li>— Sea chests</li> <li>— Other suspected areas throughout the hull.</li> </ul> </li> </ul> </li> </ul>	5 yrs	<p style="text-align: center;"><a href="#">ABS Rules 7-3-2</a></p> <p style="text-align: center;"><a href="#">NVIC 7-68</a></p>

## General Policy Discussion

**Wastage.** Wastage shall not exceed 25% of original plate thickness, unless it can be shown by calculation that the wasted plate continues to exceed ABS minimum standards.

**Original Scantlings.** If original scantlings are not known, the OCMI, in consultation with the naval architect, shall make a reasonable estimate of the original scantlings and document in MISLE as a Special Inspection note.

## Inspection Notes

### 1. Hull Audio Gauging

Hull and main structural member thickness gauging should be conducted for initial consideration of exemption, and at alternating scheduled dry docks thereafter. At the discretion of the cognizant OCMI, may be required more frequently. Gauging shall include, but not be limited to:

- Three transverse sections in the midship 0.5L;
- Internal of the fore and after peak tanks;
- Wind and water strakes, port and starboard, full length;
- All exposed main deck plating and superstructure deck plating;
- At least two shots on each bottom plate at the discretion of the attending Marine Inspector;
- Plating of sea chest; and,
- Other suspect areas throughout the hull.

E - Tail shaft and rudder examinations	Interval	References
○ <b>1. Each tail shaft must be drawn &amp; visually inspected as follows:</b>		<a href="#">46 CFR</a>
□ <b>Single tail shafts</b>	Twice in 5 yrs	<a href="#">61.20-17(b)</a>
□ <b>Multiple shafts</b>	5 yrs	<a href="#">61.20-17(c)</a>
□ <b>Tail shafts with oil lubricated bearings</b> <i>need not be pulled</i> as long as each of the following is done:	Need not be pulled	<a href="#">61.20-17(e)</a>
— Tail shaft bearing clearances at each dry-dock — Seal assemblies examined at each dry-dock	Each dry-dock	
— Analysis of tail shaft oil lubricant in accordance with manufacturer's recommendations.	Minimum every 6 months	
— NDT tapered tail shaft and keyway in place (if fitted)	5 yrs	
— NDT coupling bolts and flange for props with coupling in place (if fitted).	When removed	
□ <b>Tail shafts with inaccessible portions</b> 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.	5 yrs	<a href="#">61.20-17(d)</a>
○ <b>2. Tail Shaft Exam Item:</b>	See D 1.	<a href="#">61.20-18(b)</a>
□ <b>Tail shafts with fitted keys</b> — NDT of forward 1/3 of the shaft's taper section and keyway — Visual examination of entire shaft	For intervals	<a href="#">61.20-18(c)</a>
□ <b>Tail shafts with a propeller fitted by means of coupling flange</b> — NDT coupling flange, fillet at propeller end, coupling bolts — Visual examination of entire shaft		
○ <b>3. Rudder and Rudder Shaft Examination, to include but not limited to the following:</b>	Twice in 5 yrs not to exceed 3 yr int.	<a href="#">ABS Rules Part 3-2-11</a>
□ Ensure rudder bearing clearances are within manufacturer's specifications.  □ Rudder plating, welds, 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	When removed	

<p>○ <b>4. Examination requirements for tail shaft bearing wear-down (Check Applicable Box)</b></p> <p><input type="checkbox"/> <u>Non-rubber water lubricated bearings</u> must be refurbished as follows:</p> <p>— Propelling machinery located amidships:</p> <table border="1" data-bbox="305 443 1052 642"> <thead> <tr> <th colspan="2">For shaft diameters</th> <th>After stern tube bearing refurbished</th> </tr> <tr> <th>Greater than</th> <th>Less than or equal to</th> <th>When clearance worn down to</th> </tr> </thead> <tbody> <tr> <td></td> <td>229 mm (9 in)</td> <td>6.4 mm (.025 in)</td> </tr> <tr> <td>229 mm (9 in)</td> <td>305 mm (12 in)</td> <td>7.95 mm (0.3125 in)</td> </tr> <tr> <td>305 mm (12 in)</td> <td></td> <td>9.53 mm (0.375 in)</td> </tr> </tbody> </table> <p>— Propelling machinery located aft:</p> <table border="1" data-bbox="305 747 1052 947"> <thead> <tr> <th colspan="2">For shaft diameters</th> <th>After stern tube bearing refurbished</th> </tr> <tr> <th>Greater than</th> <th>Less than or equal to</th> <th>When clearance worn down to</th> </tr> </thead> <tbody> <tr> <td></td> <td>229 mm (9 in)</td> <td>4.8 mm (.1875 in)</td> </tr> <tr> <td>229 mm (9 in)</td> <td>305 mm (12 in)</td> <td>6.35 mm (0.25 in)</td> </tr> <tr> <td>305 mm (12 in)</td> <td></td> <td>7.93m (0.3125 in)</td> </tr> </tbody> </table> <p><input type="checkbox"/> <u>Rubber water lubricated bearings</u> must be refurbished when any water groove is ½ the original depth.</p> <p><input type="checkbox"/> <u>Oil lubricated bearings</u> must be rebushed when deemed necessary by the Officer in Charge, Marine Inspection. The manufacturer's recommendation shall be considered in making this determination.</p>	For shaft diameters		After stern tube bearing refurbished	Greater than	Less than or equal to	When clearance worn down to		229 mm (9 in)	6.4 mm (.025 in)	229 mm (9 in)	305 mm (12 in)	7.95 mm (0.3125 in)	305 mm (12 in)		9.53 mm (0.375 in)	For shaft diameters		After stern tube bearing refurbished	Greater than	Less than or equal to	When clearance worn down to		229 mm (9 in)	4.8 mm (.1875 in)	229 mm (9 in)	305 mm (12 in)	6.35 mm (0.25 in)	305 mm (12 in)		7.93m (0.3125 in)	<p>Twice in 5 yrs not to exceed 3 yr interval</p>	<p>46 CFR <a href="#">61.20-23(a)</a></p> <p><a href="#">61.20-23(a)(1)</a></p> <p><a href="#">61.20-23(a)(2)</a></p> <p><a href="#">61.20-23(b)</a></p> <p><a href="#">61.20-23(c)</a></p>
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## General Policy Discussion

None.

## Inspection Notes

### 1. Tail Shaft Examination Intervals

Each examination and test prescribed by these sections must be conducted in accordance with [46 CFR 61.20-15](#) in the presence of a Coast Guard Marine Inspector.

A lubricant that demonstrates the corrosion inhibiting properties of oil when tested in accordance with ASTM D 665 (incorporated by reference, see Sec. [61.03-1](#)) is considered to be equivalent to oil for the purposes of the tail shaft examination interval.

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Except as provided in paragraphs (4-5), of this section, each tail shaft must be examined twice within any 5 year period. No more than 3 years may elapse between tail shaft exams.

Tail shafts on vessels fitted with multiple shafts must be examined at an interval not to exceed once every 5 years.

Tail shafts with inaccessible portions fabricated of materials resistant to corrosion by sea water, or fitted with a continuous liner or a sealing gland which prevents sea water from contacting the shaft, must be examined once every 5 years if they are constructed or fitted with a taper, keyway, and propeller designed in accordance with the American Bureau of 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 ASTM D *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.

### **2. Tail Shaft Examination Items**

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 when removed, in addition to a visual examination of the entire shaft.

### **3. Rudder and Rudder Shaft Examinations**

Examinations shall include, but are not limited to the following items:

- rudder plating, weldments, water leakage:
- rudder stocks, and if fitted with a tapered stock, the keyways, keys and locking nut:
- pintles,

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- 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.

#### 4. Tail Shaft Clearance, Bearing Weardown.

Non-rubber water lubricated bearings must be refurbished as follows:

Propelling machinery located amidships:

For shaft diameters		After stern tube bearing refurbished
Greater than	Less than or equal to	When clearance worn down to
	229 mm (9 in)	6.4 mm (.025 in)
229 mm (9 in)	305 mm (12 in)	7.95 mm (0.3125 in)
305 mm (12 in)		9.53 mm (0.375 in)

Propelling machinery located aft:

For shaft diameters		After stern tube bearing refurbished
Greater than	Less than or equal to	When clearance worn down to
	229 mm (9 in)	4.8 mm (.1875 in)
229 mm (9 in)	305 mm (12 in)	6.35 mm (0.25 in)
305 mm (12 in)		7.94m (0.3125 in)

Rubber water lubricated bearings must be refurbished when any water groove is 1/2 the original depth.

Oil lubricated bearings must be rebushed when deemed necessary by the Officer in Charge, Marine Inspection. The manufacturer's recommendation shall be considered in making this determination.

### **Kort Nozzles**

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.

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<b>F - Watertight and Weathertight Integrity</b>	<b>Interval</b>	<b>References</b>
<p>○ <b>1. All watertight/weather tight closures as listed in the stability addendum or ABS LL-11d:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Closures clearly labeled/identified &amp; correlate to stability addendum or ABS LL-11d</li> <li><input type="checkbox"/> Labeled “Opening authorized for transit only – keep closed at sea”</li> <li><input type="checkbox"/> All dogs operable</li> <li><input type="checkbox"/> Chalk or light tested for fit and watertight integrity</li> <li><input type="checkbox"/> Seal not painted, badly cracked or deteriorated</li> <li><input type="checkbox"/> Examine sealing edge of closure frame</li> </ul>	Annually	<p><a href="#">ACSA Guide Section F Discussion</a></p> <p>ABS LL-11d</p>
<p>○ <b>2. All watertight/weather-tight closures listed in stability booklet addendum shall have administrative controls for managing the status as listed below:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Detailed preventive maintenance schedule for each of the closures listed.</li> <li><input type="checkbox"/> Written instructions for at-sea security watches.</li> <li><input type="checkbox"/> Each closure listed must include required closure status for at least the following vessel conditions: <ul style="list-style-type: none"> <li>— When the vessel is in transit</li> <li>— When the vessel is actively fishing/processing</li> <li>— When idle on the fishing grounds</li> </ul> </li> </ul>	Annually	<p><a href="#">ACSA Guide Section F Discussion</a></p>
<p>○ <b>3. Personnel access doors located on the main deck and opening to the vessel’s interior in the aft 1/3L of the vessel and other locations that pose a particular risk to down flooding:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> If watertight door: <ul style="list-style-type: none"> <li>— Minimum coaming height 3 inches</li> <li>— Shall be six-dog “quick acting” type</li> </ul> </li> <li><input type="checkbox"/> If weathertight door <ul style="list-style-type: none"> <li>— Minimum coaming height 24 inches</li> <li>— “Door Ajar” alarm (both audio and visual) must be installed at the pilot house operating station. 60 seconds delay feature may be installed.</li> </ul> </li> </ul>	Annually	<p><a href="#">ACSA Guide Section F Discussion</a></p>
<p>○ <b>4. Factory space high water alarms</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Installed in each corner of the factory <b>or</b></li> <li><input type="checkbox"/> Installed in an alternate arrangement approved by the OCMI</li> <li><input type="checkbox"/> Alarm at water level greater than 6 inches</li> <li><input type="checkbox"/> Time delay (up to 5 seconds) may be allowed</li> <li><input type="checkbox"/> Visual alarm <ul style="list-style-type: none"> <li>— Installed in the factory</li> <li>— Installed at the machinery control flat</li> <li>— Installed in the pilot house at piloting station instrument panel</li> </ul> </li> <li><input type="checkbox"/> Distinctive indicator</li> <li><input type="checkbox"/> Audible alarm in pilot house</li> </ul>	Annually	<p><a href="#">ACSA Guide Section F</a></p>

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<ul style="list-style-type: none"> <li>○ <b>5. Vents</b> <ul style="list-style-type: none"> <li>☐ Ensure vent heights are min 30 inches above the main deck</li> <li>☐ Examine condition of closures</li> <li>☐ Examine vent balls and seats</li> </ul> </li> </ul>	Annually	<a href="#">46 CFR 42.15-50</a>
<ul style="list-style-type: none"> <li>○ <b>6. Below deck watertight doors, hatches and bulkheads</b> <ul style="list-style-type: none"> <li>☐ Existing internal watertight subdivision shall be maintained or restored to original condition                             <ul style="list-style-type: none"> <li>— Watertight bulkheads</li> <li>— Bulkhead penetrations</li> <li>— Watertight doors</li> </ul> </li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section F</a>

### General Policy Discussion

**General.** A major focus of the ACSA Program is to ensure internal watertight subdivision and maintain internal subdivision watertight integrity. 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.

### Inspection Notes

#### 1. 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).

#### 2. Administrative Controls

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:

- A detailed preventive maintenance schedule for watertight and weather-tight closures.
- 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.
- A 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.

#### 3. Personnel Access Doors

Quick acting watertight doors with a minimum 3” coaming are the preferred installation for personnel access doors located on the main deck and opening to the vessel’s interior, in the aft 1/3L of the vessel. However, if weathertight doors are installed, the following additional requirements must be met:

Coamings shall be a minimum of 24 inches in height; and 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.

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.

#### **4. Factory Space High Water Alarm**

A factory space high water alarm will be installed near each corner of the factory space to sense water accumulation. If it is not practicable to install alarms in all corners due to space limitations, alternate arrangements may be approved by the OCMI.

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.

#### **5. None**

**6. Internal Watertight Integrity.** The use of quick acting watertight doors in internal watertight subdivision bulkheads is strongly encouraged, as other types of watertight doors have proven to be unreliable. Marine Inspectors shall also ensure that bulkhead penetrations due to cables, piping and vents are properly addressed.

<b>G - Machinery systems</b>	<b>Interval</b>	<b>References</b>
<p>○ <b>1. Fuel System</b>                      Fuel supply piping on the pressure side must be:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Seamless piping of steel, annealed copper or brass or tubing or nickel copper meeting the requirements for materials and for thickness</li> <li><input type="checkbox"/> Non-metallic flexible hose under 10 PSI allowed only where flexibility is required to prevent damage from vibration. Such hose must not be more than 30 inches in length.</li> <li><input type="checkbox"/> Fuel / hydraulic hoses meet J-1942 or SAE J-1942-1.</li> <li><input type="checkbox"/> Hose fittings meet SAE J-1475.</li> <li><input type="checkbox"/> Approved fire sleeve material as listed in the SAE qualified hose list installed over approved hose.</li> </ul>	<p>Annually</p>	<p><a href="#">46 CFR 56.50-75(a)</a>  <a href="#">56.60 56.50-70(a)(2)</a>  <a href="#">56.60-25(b) 60-25(b)(5)</a></p>
<p>○ <b>2. Sight gauges on tanks</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Must be welded or brazed to the tank</li> <li><input type="checkbox"/> Must be heat resistant material</li> <li><input type="checkbox"/> Protected from mechanical damage</li> <li><input type="checkbox"/> Both ends of sight gauge must be fitted with devices that will automatically close should the gauge break</li> </ul>	<p>Annually</p>	<p><a href="#">58.50-10(a)(6)</a></p>
<p>○ <b>3. Main Propulsion Machinery Testing</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Obtain copy of the written test procedures</li> <li><input type="checkbox"/> Test automatic shut-down on over-speed *(if installed)</li> <li><input type="checkbox"/> Test low lube oil pressure alarm</li> <li><input type="checkbox"/> Test jacket water high temperature alarm</li> <li><input type="checkbox"/> Maintained to manufacturer's specifications</li> </ul>	<p>Annually</p>	<p><a href="#">46CFR58.05-10</a>  <a href="#">Table 62.35-50 ABS Rules: 4-7-1</a></p>
<p>○ <b>4. Electrical and Auxiliary Prime Mover Testing</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Obtain copy of written test procedures</li> <li><input type="checkbox"/> Test automatic shut-down on over-speed. If automated, provide calibration standards set by the manufacturer.*</li> <li><input type="checkbox"/> Test alarm and shut-down of low lube oil sensor</li> <li><input type="checkbox"/> Test jacket water high temperature alarm</li> <li><input type="checkbox"/> Maintained to manufacturer's specifications</li> </ul>	<p>Annually</p>	<p>46CFR  <a href="#">111.12-1(c)</a>  <a href="#">112.50(g)&amp;(h)</a></p>
<p>○ <b>5. Reverse Power Relay Test Generators</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Test reverse power relays or mechanical interlock.</li> </ul>	<p>Annually</p>	<p><a href="#">ACSA Guide Section G Discussion</a></p>
<p>○ <b>6. Preventative Maintenance Records</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> At the request of the examiner the owner/operator will provide preventive maintenance records for propulsion and electrical generation machinery.</li> </ul>	<p>Annually</p>	<p><a href="#">ACSA Guide Section G Discussion</a></p>

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<ul style="list-style-type: none"> <li>○ <b>7. Fire safety hazard survey</b> <ul style="list-style-type: none"> <li>❑ Conduct survey of machinery spaces to identify fire safety hazards.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide Section G Discussion</a>
<ul style="list-style-type: none"> <li>○ <b>8. Fuel tank vents</b> <ul style="list-style-type: none"> <li>❑ Inspect flame screen (minimum 30 X 30 mesh)</li> <li>❑ operation and seating of ball check valves</li> </ul> </li> </ul>	Annually	<a href="#">46CFR56.50-85(a)7&amp;8</a>
<ul style="list-style-type: none"> <li>○ <b>9. Electrical wiring on main engines</b> <ul style="list-style-type: none"> <li>❑ Electrical cables connecting starting batteries to main propulsion starters</li> <li>❑ Cables connecting main propulsion engines to generators                             <ul style="list-style-type: none"> <li>— Must meet IEEE Std 45, IEC 92-3, MIL-C-24640A or MIL-C-24643A(2)</li> <li>— The use of electrical welding cables is not authorized</li> </ul> </li> </ul> </li> </ul>	Annually	<a href="#">46CFR 111.60-1(a)</a>
<ul style="list-style-type: none"> <li>○ <b>10. Vital System Piping:</b> <ul style="list-style-type: none"> <li>❑ Examine fuel oil for main propulsion / emergency generators</li> <li>❑ Examine lubricating oil systems</li> <li>❑ Examine cooling water for main propulsion / emergency generators</li> <li>❑ Examine bilge and ballast systems</li> <li>❑ Examine starting and control air systems</li> <li>❑ Examine fire main and firefighting systems</li> </ul> </li> </ul>	Annually	<a href="#">56.50-80</a> <a href="#">56.50-95</a> <a href="#">56.50-57</a> <a href="#">56.50-15</a> <a href="#">56.70</a>
<ul style="list-style-type: none"> <li>○ <b>11. Non-metal expansion joints</b> <ul style="list-style-type: none"> <li>❑ <u>External</u>: Examine for excessive wear, fatigue, deterioration, damage, misalignment, improper flange to flange spacing, and leakage</li> <li>❑ When external examination reveals excessive wear or other signs of deterioration or damage, internal examination must be conducted</li> </ul> </li> </ul>	Annually	<a href="#">46 CFR 61.15-12</a>
<ul style="list-style-type: none"> <li>○ <b>12. Pressure Vessels (Compressed air receivers &gt;5 CF)</b> <ul style="list-style-type: none"> <li>❑ Internal and external examination</li> <li>❑ Data plate or stamped data is legible</li> <li>❑ Hydrostatic testing unless examined internally by a marine inspector &amp; no defects found which would impair the safety of the pressure vessel</li> <li>❑ Relief Valves tested:                             <ul style="list-style-type: none"> <li>— Set to relieve at or below MAWP</li> </ul> </li> </ul> </li> </ul>	5 yrs  5 yrs  Twice in 5 yrs	46 CFR  <a href="#">61.10-5</a>  <a href="#">54.15-5</a>

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<p>○ <b>13. Guards and Exposed Hazards</b></p> <p>□ Each exhaust pipe within 15 feet of fuel, lube, or hydraulic oil sources, must be insulated or otherwise guarded to prevent ignition.</p>	<p>Twice in 5 yrs</p>	
<p>○ <b>14. Electrical Systems</b></p> <p>□ There is no requirement or expectation that existing electrical system installations will comply with the standards for inspected vessels in wiring material and Marine Inspectors will not require replacement of electrical cabling and wiring without cause. Discovery of unsafe conditions will be a 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.</p>	<p>Twice in 5 yrs</p>	

### **Additional Inspection Notes and Policy Discussion**

**1. Fuel Hoses.** All hoses carrying oil (fuel oil, lube oil, or hydraulic oil systems) located in the engine room shall be fire resistant and shall comply with J-1942 standards. Push-lock fittings are not acceptable. Exceptions to the 30 inch rule will be allowed on a case by case basis.

**2. Sight Gauges.** Tubular gauge glasses, if fitted to diesel fuel tanks, must be of heat resistant materials, adequately protected from mechanical damage, and provided at the tank connections with devices that will automatically close in the event of rupture of the gauge or gauge lines

**3. None**

**4. None**

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**5. Reverse Power Relay Testing.** 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.

**6. Preventative Maintenance Program and Examination of Records.** A documented preventive maintenance program is required for vessels in the ACSA Program.

The material, design, construction, workmanship and arrangement of main propulsion and electrical generation machinery and of each auxiliary, directly connected to the engines and supplied as such, shall be maintained to the regularly scheduled preventive maintenance standards as established by the manufacturer or the manufacturer's authorized representative.

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.

**7. Fire Hazard Surveys.** Machinery spaces, escape scuttles, and egress routes 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.

**8. None**

**9. None**

**10. Vital Piping Systems:** It is not the intent of this inspection item to require wholesale replacement of all piping systems. Existing systems can remain unless the piping is declared manifestly unsafe by the attending marine inspector or piping is being repaired/replaced. Welding on vital piping systems listed in item #10 must be with approved procedures using certified welders

**11. Non-Metal Expansion Joints:** Conduct an external exam for excessive wear, fatigue, deterioration, damage, misalignment, improper flange to flange spacing, and leakage. When external examination reveals excessive wear or other signs of deterioration or damage, internal examination must be conducted . Non-metal expansion joints located below the waterline must be replaced every ten years.

### **12. None**

### **13. 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.

### **14. Electrical Systems**

There is no requirement or expectation that existing electrical system installations will comply with the standards for inspected vessels in wiring material and Marine Inspectors will not require replacement of electrical cabling and wiring without cause. Discovery of unsafe conditions will be a 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.

## ACSA Guidance

<b>H - Life Saving Equipment &amp; Arrangements</b>	<b>Interval</b>	<b>References</b>
<ul style="list-style-type: none"> <li>○ <b>1. Liferafts</b> <ul style="list-style-type: none"> <li>❑ Liferafts approved under <a href="#">46 CFR 160.151</a>.</li> <li>❑ Mounted so can be manually launched by one person.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section H 1</a>
<ul style="list-style-type: none"> <li>○ <b>2. Liferaft Embarkation ladders</b> <ul style="list-style-type: none"> <li>❑ Must be installed for each life raft embarkation station that is five feet or more above the waterline in normal operating conditions</li> </ul> </li> </ul>	Annually	<a href="#">section H 2</a>
<ul style="list-style-type: none"> <li>○ <b>3. Immersion Suits</b> <ul style="list-style-type: none"> <li>❑ Immersion suits maintained to manufactures specifications</li> <li>❑ Each immersion suit is required to be fitted with a Coast Guard approved strobe type PML.</li> </ul> </li> </ul>	Annually	<a href="#">NVIC 1-08 section H 3</a>

### Additional Inspection Notes and Policy Discussion

#### 1. 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.

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.

#### 2. Liferaft Embarkation Ladders

A chain ladder meeting the requirements of [46 CFR 160.017](#) may meet the requirement for a liferaft station embarkation ladder, but **MAY NOT** be substituted for the required pilot boarding ladder required under [50 CFR 600.504\(d\)\(3\)](#). However a pilot boarding ladder required under [50 CFR 600.504\(d\)\(3\)](#) **MAY** meet the requirements of the liferaft embarkation station.

The pilot boarding ladder required under [50 CFR 600.504\(d\)\(3\)](#) **MUST** meet the construction requirements of Regulation 17, Chapter V of the International Convention for the Safety of Life at Sea (SOLAS), 1974 (TIAS 9700 and 1978 Protocol, TIAS 10009), or a substantially equivalent national standard approved by letter from the Assistant Administrator, with agreement with the USCG.





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<ul style="list-style-type: none"> <li>○ <b>8. Smoke Detectors for accommodation spaces</b> <ul style="list-style-type: none"> <li>❑ Acceptable detectors include:           <ul style="list-style-type: none"> <li>— Independent modular smoke detector: Must meet UL-217 standards.</li> <li>— Smoke actuated fire detecting unit: Must be installed IAW 46CFR76.33.</li> </ul> </li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section I discussion</a>
<ul style="list-style-type: none"> <li>○ <b>9. Structural fire protection</b> <ul style="list-style-type: none"> <li>❑ A-0 boundaries must isolate all internal combustion machinery spaces.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section I discussion</a>
<ul style="list-style-type: none"> <li>○ <b>10. Non-combustible insulation.</b> <ul style="list-style-type: none"> <li>❑ Any insulation replaced in hidden spaces must be of non-combustible material IAW 46CFR Subchapter Q.</li> <li>❑ If foam insulation is replaced it must be USCG or ABS approved material.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section I discussion</a>

### Additional Inspection Notes and Policy Discussion

**1. Enclosed spaces**

**2. Vessel specific fire extinguishing system:** Installed in accordance with 46 CFR 76.15 and other appropriate NFPA standards.

**3. None**

**4. None**

**5. None**

**6. To be developed**

**7. None**

**8. Smoke Detectors for 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](#).

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.

### **9. A-0 Boundaries**

It is the intent of this requirement to assure there is an intact steel bulkhead in all machinery spaces.

A-0 bulkheads or decks surrounding these machinery spaces 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.

Machinery space bulkheads and decks shall remain intact at each cable and piping penetrations. Deficiencies shall be corrected at the earliest opportunity.

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.

### **10. Non-Combustible Insulation**

Any exceptions are at the discretion of the local OCMI.



## ACSA Guidance

<ul style="list-style-type: none"> <li>○ <b>5. Freon detectors:</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Installed in spaces containing main receiver and compressors</li> <li><input type="checkbox"/> Portable Freon detectors shall also be on board</li> <li><input type="checkbox"/> Must be calibrated within the manufacture’s specifications.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide section J</a>
<ul style="list-style-type: none"> <li>○ <b>6. CO2/Halon detection system</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Installed in any accommodation space where gas cylinders are stored</li> <li><input type="checkbox"/> Test the function of the gas detection system</li> </ul> </li> </ul>	Annually	<a href="#">NFPA 12 Chapter 4.3.3.1.1</a>

### Additional Inspection Notes and Policy Discussion

#### 1. Portable Fire / Dewatering Pump Arrangements

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

2. None

3. None

4. None

**5. 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.

**6. 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 UL2075 standard. Therefore, the OCMI shall accept this equipment 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.

<b>K - Emergency Drills and Training</b>	<b>Interval</b>	<b>References</b>										
<p>○ <b>1. Emergency drills must be conducted by a trained individual in the presence of a USCG Examiner, to include but not limited to:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Fire</li> <li><input type="checkbox"/> Flooding</li> <li><input type="checkbox"/> Abandon ship (<i>including donning of immersion suits</i>)</li> <li><input type="checkbox"/> Person overboard</li> </ul>	Annually	<p>46 CFR</p> <p><a href="#">28.275</a></p> <p><a href="#">28.270</a></p>										
<p>○ <b>2. Required number of qualified drill conductors in crew complement</b></p> <table border="1" data-bbox="240 667 1096 919"> <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>Min. 5</td> </tr> </tbody> </table>	Persons on board	Certified Drill Conductors	Less than 16	2	16-25	3	26-35	4	36 or more	Min. 5	Annually	<p><a href="#">ACSA Guide Section K</a></p>
Persons on board	Certified Drill Conductors											
Less than 16	2											
16-25	3											
26-35	4											
36 or more	Min. 5											
<p>○ <b>3. Record keeping of emergency drills and training</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Logged by the master <ul style="list-style-type: none"> <li>— Includes date of each drill</li> <li>— Conducted not more than 30 days from previous drill</li> <li>— Log should indicate those that did not participate and why</li> <li>— Must be maintained on board for 1 year and in the main office for 3 years</li> </ul> </li> <li><input type="checkbox"/> Records of drills and instruction include at least the following contingencies: <ul style="list-style-type: none"> <li>— Abandon ship</li> <li>— Launching survival craft</li> <li>— Donning immersion suits or PFDs</li> <li>— Making voice radio distress calls/using visual distress signals</li> <li>— Recover person overboard</li> <li>— Activating general alarm</li> <li>— Reporting inoperative alarm &amp; fire detection systems</li> <li>— Minimizing effects of accidental flooding</li> <li>— Fighting a fire</li> <li>— Donning Fireman’s outfits / SCBAs if equipped</li> </ul> </li> </ul>	Annually	<p><a href="#">ACSA Guide Section K</a></p> <p><a href="#">46 CFR 28.270</a></p>										
<p>○ <b>4. Communications among crew</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Vessel has AMSEA or NPFVOA safety videos tapes / CDs that provide training on emergency procedures for non-English speaking crew.</li> </ul>	Annually	<p><a href="#">ACSA Guide Section K</a></p>										

## **Additional Inspection Notes and Policy Discussion**

**1. Emergency Drills.** Drills must be conducted with the vessel's crew on board

### **2. Minimum Number of Drill Conductors and 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.

### **3. Frequency and Record Keeping of Emergency Drills**

All emergency drills and training shall be logged by the master of the vessel

Emergency drills shall be conducted at least once each 30 days and must cover all contingencies listed in [46 CFR 28.270](#).

Emergency drill log entries must include the name and reason for missing the drill for each person not participating in an emergency drill.

Drills must be conducted anytime a person with safety responsibilities is replaced.

Within each 30 days each person on board must have received instruction complying with [46 CFR 28.270](#).

### **4. Communications Among Crew**

Every reasonable effort shall be made to ensure that all non-English speaking crew members and fish processing personnel are familiar with their emergency responsibilities and duties.

North Pacific Fishing Vessel Owners Association and Alaska Marine Safety Education Association Spanish & Vietnamese language safety videos.

<b>L – Emergency Communications and Navigation</b>	<b>Interval</b>	<b>References</b>
<p><b>1. Notification prior to discharging fixed systems</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> If vessel policy requires notification of the Master prior to fixed system activation then:               <ul style="list-style-type: none"> <li>— Must have clear written procedures</li> <li>— Signed by Master and Chief Engineer</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide Section L</a>
<p><b>2. Fixed System emergency communications equipment</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Installed communication system between activation control station and wheelhouse must be installed or</li> <li><input type="checkbox"/> Emergency handheld radios may be used to meet this requirement.               <ul style="list-style-type: none"> <li>— Radios are stowed upon the bridge and at the controls to the fixed fire fighting system.</li> </ul> </li> </ul>	Annually	<a href="#">ACSA Guide Section L</a>
<p><b>○ 3. Automatic Identification System (AIS)</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Must have an approved AIS installed and operational</li> </ul>	Annually	<a href="#">ACSA Guide Section L</a>
<p><b>○ 4. Global Maritime Distress Signal System (GMDSS)</b>  <i>Fish Processing Vessel 300 GT and over:</i></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Search and Rescue Transponder (SART)               <ul style="list-style-type: none"> <li>— &lt; 500 GT 1 SART</li> <li>— ≥ 500 GT 2 SARTs</li> </ul> </li> <li><input type="checkbox"/> 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"> <li>— Must operate on channel 16 and one other channel (channel 6 recommended)</li> </ul> </li> <li><input type="checkbox"/> 2 VHF radio installation               <ul style="list-style-type: none"> <li>— Capable of operating on:                   <ul style="list-style-type: none"> <li>- Channel 6 (156.3 MHz),</li> <li>- Channel 13 (156.65 MHz); and,</li> <li>- Channel 16 (156.8 MHz)</li> </ul> </li> </ul> </li> <li><input type="checkbox"/> 1 MF radio installation (Single Side Band)               <ul style="list-style-type: none"> <li>— Capable of operating on 2 frequencies between (1605-3500 kHz)</li> </ul> </li> <li><input type="checkbox"/> 1 NAVTEX receiver</li> </ul>	Annually	<a href="#">ACSA Guide Section L</a>

### **Additional Inspection Notes and Policy Discussion**

**1. Notification Procedures.** 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.

### **2. Fixed System emergency communications 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.

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.

**3. None**

**4. None**

## Annex 1 – Product Codes

The products listed below are identified by the National Marine Fisheries Service regulations [50 CFR, Part 679, Table 1a](#). These products are typical of the Bering Sea/Aleutian Island (BSAI) and Gulf of Alaska (GOA) cod freezer longliner and non - pollock freezer trawler fleets.

Product codes designated Head & Gut (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-CVC).

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

## ACSA Guidance

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	Hull Audio Gauging				<i>5 Years</i>		
D	Drydock / Internal Structural Exam				<i>Twice in 5 Years, NTE 3 Years</i>		
E	Tail Shaft Exam				<i>See sec. D</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 conversion<sup>1\*</sup>.

#### Maintaining Grandfather Status

The OCMI, in consultation with the District, 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.

---

<sup>1</sup> 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.

# ACSA Guidance

Annex 4 – Sample Renewal Request Letter-----  
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## COMPANY LETTERHEAD

.....

To: Commander (dpi) U.S. Coast Guard District  
C/O Officer in Charge of Marine Inspection\* Washington: 1519 Alaskan Way S., Bldg 4,  
Seattle, WA. 98134  
\* Ketchikan: 709 W. 9<sup>th</sup> Street, Suite 223B, Juneau, AK 99802  
\* Western Alaska: 49000, 510 Army Guard Road #100, Jber, AK 99505

Date:

Sir:

In accordance with 46 CFR Part 28.60 and the Alternate Compliance and Safety Agreement (ACSA) Guidance, I am requesting a renewal exemption from classification and load line for the following vessels listed below.

Vessel Name	Official Number	Specific Exemption	Exam Location
Bering Cod	38669	Class & Load Line	Fishermen's Terminal, WA
Bering Flat	38670	Class only	Unalaska, AK

This vessel will produce fish products that are determined to be “beyond minimal processing.” We therefore authorize United States Coast Guard marine inspectors to come aboard the vessel for initial, mid-period, and periodic examinations to ensure continued compliance with ACSA program requirements.

Sincerely,

Name

\*Please ensure you include the address where you want the Exemption Letter mailed

\*This request may be submitted by e-mail: [troy.rentz@uscg.mil](mailto:troy.rentz@uscg.mil)

**Annex 5 – Sample ACSA Exemption Letter  
(with USCG COC endorsement)**

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  
May 3, 2011

**Bering COD LLC**  
1445 NW 4<sup>th</sup> Ave.  
Seattle, WA 98134

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

Ref: (a) CG-543 Policy Letter 12-01 dated February 15, 2012  
(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 April 13th, 2011, under the procedures established by the Alternate Compliance and Safety Agreement (ACSA) Program as described in references (a) and (b), you requested that the fish processing vessel XXXXXX be exempted from the following requirements:

- 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
- Title 46 CFR Subchapter E, requirements for a Load Line Certificate.

On April 23rd, 2011 you completed all requirements of the ACSA program. 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. 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 exemption shall expire on April 30th, 2013 unless terminated earlier.**

This allows the vessel to continue to operate as a fish processing vessel and to produce only those products as listed as "H & G" and "Beyond Minimal Processing" in Annex 1 of the ACSA Guide. This exemption does not allow for the processing of products as listed as "Extensive Processing" in Annex 1 of the ACSA Guide.

## ACSA Guidance

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In order for this exemption to remain valid the following ACSA examinations must be completed as scheduled. Extensions may be requested through the cognizant USCG Officer in Charge Marine Inspection. This office must be copied on all requests for extension.

- (a) You must request an ACSA exemption renewal exam and issuance of a new exemption letter 60 days prior to the expiration of this exemption.
- (b) An ACSA mid-period exam and accompanying Certificate of Compliance (COC) Examination shall be completed within sixty days either side of April 30th, 2012;
- (c) The COC exam may 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.
- (d) Next dry-dock is required no later than January 31st 2014. 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;

**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

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**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

**Annex 5 – Sample ACSA Exemption Letter  
(with a Third Party COC)**

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  
October 19, 2011

**Bering COD LLC  
1445 NW 4<sup>th</sup> Ave.  
Seattle, WA 98134**

Subj: **BERING COD, O.N. 125346, EXEMPTION FROM 46 CFR 28.720 AND 46 CFR  
SUBCHAPTER E**

Ref: (a) CG-543 Policy Letter 12-01 dated February 15, 2012  
(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

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- (b) An ACSA mid-period exam shall be completed within sixty days either side of August 6th, 2011;
- (c) You have elected to have the Certificate of Compliance (COC) conducted by a third party. You must retain a copy of the third party COC on board. The next COC exam is required no later than August 6th, 2011.
- (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

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**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.

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Name                      Unit                      Location                      Date                      Examiner's signature

## Annex 6 - Relative Comparison of Load Line and ACSA Requirements

### Relative Comparison of Load Line and ACSA Requirements

The purpose of load line assignment is to ensure the seaworthiness of an intact (undamaged) vessel. This is accomplished by:

- Ensuring a robust hull that can withstand severe sea conditions (*i.e., structural design, construction, and maintenance*)
- Ensuring weathertight & watertight integrity (*i.e., coamings; exposed doors, hatches, hull valves, etc. are in good working condition*)
- Ensuring that the vessel has reserve buoyancy and is not overloaded (*by limiting the maximum loaded draft*)
- Ensuring that the vessel has adequate stability for all loading & operating conditions (*by approved stability documentation & instructions*)
- Ensuring rapid drainage of boarding seas (*by adequate arrangement of freeing ports in bulwarks*)
- Ensuring safety of crew while working on deck (*by increased freeboard to reduce boarding seas, guardrails*)
- Ensuring that modifications to vessel do not compromise seaworthiness (*modifications must be approved by LL assigning authority*)
- Periodic third party inspections (afloat and drydocked) to verify that the above measures are properly maintained (*by authorized class society*)

Each of these seaworthiness elements are compared below with the equivalent ACSA requirement.

Seaworthiness element	Load Line requirements	ACSA requirements
Strength of hull	<ul style="list-style-type: none"> <li>• Designed &amp; constructed in accordance with ABS Rules for ocean service</li> <li>• Maintained in accordance with ABS structural requirements &amp; corrosion limits</li> <li>• Drydocked every 5 years for inspection</li> <li>• Audiogauging of hull (plating and stiffeners) as required by ABS. Extent of gaugings increases as vessel ages (<i>especially after 15 years</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• Many ACSA vessels were not originally built to ABS standards. However, the robustness of their hull construction has been demonstrated by years of service. <i>The objective, therefore, is to preserve their inherent robustness.</i></li> <li>• Must undergo hull &amp; structural gauging as part of ACSA enrollment. Excessively corroded members (<i>i.e., more than 25% loss</i>) must be replaced unless calculations show that remaining thickness exceeds ABS minimum standards.</li> <li>• Similar to ABS standards</li> <li>• Drydocked twice in 5 years (<i>not more than 3 years between drydockings</i>)</li> <li>• Similar to ABS standards</li> </ul>

## ACSA Guidance

Seaworthiness element	Load Line requirements	ACSA requirements
Weathertight integrity <i>Coamings</i> <i>Exposed doors, hatches, vent covers, etc</i>	<ul style="list-style-type: none"> <li>• Critical vents, air pipes, doorways protected by coamings (6" to 24" high, depending on location)</li> <li>• Documented list of closures</li> <li>• Inspected annually</li> </ul>	<ul style="list-style-type: none"> <li>• 24-inch coamings required on Main Deck doors located in aft 1/3 of vessel; other existing coamings may have to be increased</li> <li>• Documented list of closures</li> <li>• Inspected Annually</li> </ul>
Watertight integrity of hull penetrations <i>(valves &amp; associated piping systems)</i>	<ul style="list-style-type: none"> <li>• Documented list of penetrations</li> <li>• Inspected during drydockings (i.e., every 5 years)</li> </ul>	<ul style="list-style-type: none"> <li>• Documented list of penetrations</li> <li>• Inspected every other drydocking (i.e., every 5 years)</li> </ul>
Reserve buoyancy & prevention of overloading	<ul style="list-style-type: none"> <li>• Draft limit determined by freeboard assignment or stability calculations (whichever is more severe)</li> <li>• Limiting draft marked on hull with midship load line marks.</li> </ul>	<ul style="list-style-type: none"> <li>• Draft limited by stability calculation</li> <li>• Maximum draft marked on hull with special midship marks</li> </ul>
Stability	<ul style="list-style-type: none"> <li>• Must meet appropriate stability criteria</li> <li>• Easy-to-use stability &amp; loading instructions must be provided for master</li> <li>• Must have valid stability documentation</li> <li>• Stability is reassessed only if modifications result in significant weight changes</li> </ul>	<ul style="list-style-type: none"> <li>• Must meet appropriate stability criteria</li> <li>• Easy-to-use stability &amp; loading instructions must be provided for master</li> <li>• Must have valid stability documentation</li> <li>• Must have been inclined within previous 5 years of ACSA enrollment</li> <li>• Stability must be reassessed every 5 years (must be re-inclined unless a deadweight survey confirms that no weight changes have occurred)</li> </ul>
Rapid drainage of boarding seas	<ul style="list-style-type: none"> <li>• Bulwarks must have adequate arrangement of freeing ports (specific requirements regarding location, size)</li> </ul>	<ul style="list-style-type: none"> <li>• Existing freeing ports might have to be upsized (must be sufficient to allow rapid clearing of water in all probable conditions of list &amp; trim)</li> </ul>
Protection of crew while working on deck <i>Increased freeboard</i> <i>Guardrails</i>	<ul style="list-style-type: none"> <li>• Manned vessels assigned more freeboard than unmanned vessels</li> <li>• Guardrails required around periphery of all decks &amp; other critical walkways (must meet specific design &amp; construction requirements)</li> </ul>	<ul style="list-style-type: none"> <li>• Existing guard rail arrangements may have to be improved</li> </ul>
Control	<ul style="list-style-type: none"> <li>• Modifications that affect seaworthiness or freeboard assignment must be reviewed &amp; approved by the LL assigning authority.</li> </ul>	<ul style="list-style-type: none"> <li>• Modifications which affect stability, closures, hull penetrations, and factory sump pumping system must be approved by naval architect and brought to attention of USCG inspector.</li> <li>• Copies of Stability Instructions and Inclining/Deadweight Surveys are to be submitted to local USCG.</li> </ul>
Periodic inspections	<ul style="list-style-type: none"> <li>• Annual inspections:                             <ul style="list-style-type: none"> <li>○ Protection of openings (weathertight closures)</li> <li>○ Guardrails</li> <li>○ Freeing ports</li> <li>○ Means of access to crew quarters</li> <li>○ Verification that no modifications have been made that invalidate LL assignment</li> </ul> </li> <li>• Drydock inspections:                             <ul style="list-style-type: none"> <li>○ Hull &amp; deck plating (gauged as required)</li> <li>○ Internal structure (gauged as required)</li> <li>○ Hull penetrations (valves, sea chests, discharges, etc)</li> </ul> </li> <li>• Inspections conducted by surveyors of LL-assigning authority</li> </ul>	<ul style="list-style-type: none"> <li>• Annual inspections Same as load line inspections</li> <li>• Drydock inspections: Same as load line inspections</li> <li>• Annual &amp; drydock inspections conducted by USCG inspectors/examiners.</li> </ul>