

ACSA meeting notes

30 June 2009
Seattle, Washington

Introductions: went around the room; people introduced themselves.
37 Attendees signed the roster; representing North Pacific freezer-longliners, freezer-trawlers, consultants and Coast Guard.

History of ACSA: Dan Hardin presented the timeline for ACSA implementation and summarized significant ACSA achievements to date.

Modifications to the ACSA Examination Standards: Discussed process for future changes to ACSA examination Standards. Stakeholders will be provided written notice on future changes to ACSA examination standards and will have the opportunity to provide input & feedback. The process has been written into the ACSA Implementation Guide.

Proposed modifications to the ACSA Implementation Guide:

- Copies of proposed modifications to the ACSA Implementation Guide were distributed to attendees. The ACSA Implementation Guide serves as the primary guidance for the ACSA program.
- USCG ACSA documents may be accessed at www.fishsafe.info, or using the USCG Homeport main page <http://homeport.uscg.mil> . Under “Missions” Domestic Vessels > Uninspected Vessels > Commercial Fishing Vessels > Policy. The updated guide will be posted when completed.
- Page by page review of ACSA Implementation Guide revision 29 June 2009:
 - References were updated throughout the document.
 - The cover shows the latest revision date on the bottom
 - Pages 1-2, Points of contact: Mr. Troy Rentz added as ACSA Program Coordinator. Mr. Ed Minor added as Sector Anchorage ACSA Inspector.
 - Pages 3-5, Table of Contents will be revised upon completion of 2009 modifications.
 - Page 11, requesting an exemption letter: Removed requirements that were not part of the original agreement.
 - Page 12, Revocation of an exemption letter: Inserted procedure for appeals.
 - Page 14, added “ACSA Inspection Requirements” Clarifies that both ACSA and COC exams are to be completed on an annual basis for

vessels enrolled in the ACSA program.

-Future Exemption Letters issued under the ACSA program will have endorsement blocks to be filled out by the USCG representative when annual examinations are completed.

- Another paragraph will be added clarifying that Hull Exams and Expiration of Exemption Letters are “drop dead dates”. They may be completed prior to the due date but may not exceed the due date/expiration date.

- Page 14, Modifications to the ACSA Examination Standards: New paragraphs state that stakeholders will be provided notice on future changes to ACSA examination Standards and will have 30-60 days (depending on urgency) to provide feedback.
- Page 16, Administration: checklist was added as an aid to verify completion of annual COC exams.
- Page 18, processing space sump pumps: deleted language requiring sump pumps on each side of the vessel capable of dewatering at “twice” the rate of water introduced into the factory space. Now “at” the rate of water introduced into the factory space.
 - The operator of a vessel with unique arrangements that provide an equivalent level of safety and meet the intent of this requirement should include an explanation in their request for an exemption under 46 CFR 28.60”.
- Page 21 checklist: ground tackle inspection interval changed from twice in 5 years to every 5 years. Requirement will be defined further in the discussion section.
 - Ground tackle references are used only for purposes of sizing and arrangement details. A paragraph will be developed to discuss ground tackle standards.
- Page 27 Rudder and Rudder Shaft Examinations: A paragraph will be developed by a work group to address special considerations for Kort Nozzles and Z drives.
- Page 28, Hull Audio Gauging: requirement for bottom plate changed to read “At least two shots on each bottom plate at the discretion of the attending Marine Inspector”. Previously read “all bottom plating”.
- Pages 34-36, Machinery Systems: deleted wording for a Maintenance Schedules Checklist under Machinery Maintenance in favor of language from the original ACSA agreement, Preventive Maintenance Program.
 - Moved Fire Hazard Survey and A-Class Bulkheads to “Fixed fire fighting equipment & arrangements” (page 39).
 - Diesel propulsion machinery tests: Changed automatic shutdown on over speed to automatic shutdown on over speed (if installed).
- Page 40, fixed fire fighting equipment & arrangements: revised language for A-0 fire boundaries and non-combustible insulation on checklist.

- Page 41 Clarified fixed gas fire extinguishing system is required for spaces containing main “and auxiliary” internal combustion engine(s) of more than 50 horsepower.
- Pages 42-43, Fire Hazard Surveys and A-0 Boundaries: Significant changes were made to this section before and during the ACSA meeting. New proposed wording is attached to the end of these notes.
- Carbon Dioxide Detectors were expensive and hard to find an approved type. Added language that the OCMI may accept an oxygen level detector as an alternative.
- Page 44, Checklist, Freon Detectors: A paragraph will be developed to clarify that Freon detectors are only required when Freon is used in the refrigeration system for freezer holds and will not be required where Freon is used in small quantities.
- Page 45, Firefighting Equipment: Added each SCBA must be “positive pressure”.
- Annex 1, Product Codes: deleted “& tail removed” from description of product code 8
- Removed Alternate Compliance and Safety Agreement Program Clarification Message (previously Annex 4). This was a historical document that can not be changed. Much of the information from the message was incorporated into the Implementation Guide.
- Annex 4, Sample Renewal Request Letter: Removed additional language that was not part of the original agreement.

The USCG received comments and notes from several people regarding grammar, references & formatting. Small changes that do not involve policy will be made to our next revision. Thank you for your input!

A desire to easily identify modifications to the ACSA standards was expressed. Future modifications will be recorded on a modifications summary. The modifications summary will highlight modifications and where they are located within the document. After input is received and the modifications are complete, new copies of the documents will be distributed along with the updated modifications summary. It will not require people to change out pages, insert paragraphs.....

Possible logistical changes to program: The idea for a web site with the vessel inspection status was proposed and well received. A workgroup will explore this option. One concern was competition / proprietary information would possibly be visible to competitors (dry-dock dates etc...). There is an identified need to track vessel inspection status. Reminder letters will be going out soon but may be replaced by a web site or e-mail inspection status.

- It was brought to the attention of the group that loadmarks in general permit less freeboard than loadlines. This will be discussed further. The difference may be due to calculations using intact vs. damaged stability criteria.

Repair Proposals: The group discussed possible conflicts between the USCG and ABS requirements on repair procedures.

When routine repairs are not significant, a repair proposal may not be required. In this case procedures should be discussed with the USCG Marine Inspector and Class Society (when applicable). In the case of significant repairs to a Classed and/or Loadlined vessel; Operators should submit the repair proposals concurrently to their Classification Society and the USCG OCMI. If the operator feels there is a significant difference between Coast Guard and Classification Society requirements that may cause an untimely delay, it should be brought to the immediate attention of the USCG Marine Inspector so that they may discuss a unified approach with ABS.

New wording for Fire Hazard Surveys and A-0 Boundaries

Fire Hazard Surveys

Machinery spaces and escape scuttles shall be maintained in reasonable state of cleanliness to reduce the risk of fire. Flammable materials shall not be stored within machinery spaces or in escape scuttles. Scheduled inspections shall include a survey in all machinery spaces and other spaces where flammable and combustible materials are stored and used. At each annual inspection, the Coast Guard, accepted organizations, or an accredited marine surveyor of an approved 3rd party organization and the vessel representative shall conduct a fire safety hazard survey of the engine spaces to identify and remedy any additional fire safety hazards which may exist, but are not specifically identified in the ACSA Program.

Notwithstanding the need for crew to conduct normal operations, special attention shall be given to maintaining adequate egress paths from all compartments.

A-0 Boundaries

Since machinery spaces are a common source of fire aboard vessels, it is standard practice to design machinery space bulkheads to prevent the passage of smoke and flame. This contains fires that may start within these spaces and allows time for fixed extinguishing systems to be activated or other fire fighting efforts. The longer a vessel has been in service, the more likely that bulkheads isolating machinery spaces have been breached. These breaches allow fire and smoke to spread to other compartments and impair the effectiveness of fixed extinguishing agents.

A-0 bulkheads or decks must be composed of steel or equivalent material, suitably stiffened and made intact with the main structure of the vessel, such as the shell, structural bulkheads, and decks. They must be so constructed that, if subjected to the standard fire test, they are capable of preventing the passage of smoke and flame for 1 hour. It is the intent of this requirement to assure there is an intact steel bulkhead in all machinery spaces while recognizing that many ACSA vessels have bulkheads in machinery spaces that have polyurethane foam insulation on the opposite side of the

bulkheads. Engine rooms and cargo holds share common bulkheads in standard ACSA vessel configurations.

Accepted methods of passing cables and piping through machinery space decks and bulkheads are often not used in an effort to save time and money or because conditions during repair do not permit proper penetrations to be used. The risk posed by these unsafe penetrations shall be reduced at the earliest opportunity. Marine inspectors shall ensure that machinery space bulkheads and decks remain intact at each penetration. Penetrations that are discovered non-tight shall be required to be repaired within a reasonable time.

All closures and vents in A-0 boundaries shall be constructed of steel or equivalent material. All closures and vents shall be capable of being secured manually from outside the space.