U.S. Department of Homeland Security

United States Coast Guard

Guidance for the

Alternate Compliance and Safety

Agreement Program

(ACSA)

24 May 2023

On-line ACSA Guide: www.FishSafeWest.info

More commercial fishing vessel safety information: FishSafeWest.info

Table of Contents

Introduction 1
ACSA Program Points of Contact 3
ACSA Program Background 4
ACSA Safety Standards and Permitted Processing Activities 6
Roles and responsibilities within the ACSA program 8
Section A - Administration 11
Section B – Vessel Stability 19
Section C - Dry-dock & internal structural exam 22
Section D - Hull thickness gauging 28
Section E - Tail shaft & rudder exams 29
Section F - Watertight and Weathertight Integrity 33
Section G - Machinery systems 37
Section H - Life Saving equipment & arrangements 44
Section I - Fixed firefighting equipment & arrangements 46
Section J - Other Firefighting and Safety Equipment 50
Section K - Emergency drills and training 53
Section L - Emergency communication and navigation 56
Annex 1 - Product Codes 58
Annex 2 - Compliance Matrix 60
Annex 3 - Grandfathered Fish Processing Vessels 61
Annex 4 - Sample Renewal Request Letter 62
Annex 5 - Sample ACSA Exemption Letters 63
Annex 6 - Relative Comparison of Load Line and ACSA Requirements 66
Annex 7 Engine Automation in Lieu of Assistant Engineer 67
Annex 8 Sample Lay-up request 69

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 load line 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.

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 was 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 at fishsafewest.info. Previous ACSA program guidance and other historic ACSA program documents are also maintained at the 13th 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 may be contacted at

D13-SG-SectorPugetSoundCommercialFishingVSLDiv@uscg.mil
(206) 217-6187

ACSA OCMI Representative for Sector Anchorage

Mr. Ed Miner	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	(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
(206) 217-6180
24-hour number (206) 217-6002

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, most 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 41 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 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 most 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 categorizes 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.

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 load line, 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.

- 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 + Load line: 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 all required examinations for enrollment into the ACSA program, and that all activities related 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 consider lessons learned from the previous year's examinations or to consider 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 13th District ACSA Coordinator and include input from vessel owners (typically represented by industry associations), the 17th Coast Guard District and the affected OCMI/Sector offices.). Recommended changes will then be proposed at an ACSA Stakeholders' Meeting. If there is concurrence to change the ACSA Guidance following the meeting, a memo shall be drafted and routed from the 13th District ACSA Coordinator to Coast Guard Headquarters CG-CVC thru the 17th 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.

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' Responsibilities

- At least 60 days prior to the ACSA Renewal Exam ACSA vessel owners must 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 to initiate tracking
- Track examination due dates and ensure requests for ACSA examinations are made to the Coast Guard in a timely manner.
- Be prepared for examinations by completing inspection checklists in the ACSA 840 Book.
- Ensure deficiencies are corrected in a timely manner and followed up with communications with the ACSA Examiner.
- Ensure vessels and crews remain in continual compliance with the agreement
- Notify the appropriate USCG ACSA Examiner of emergency or unplanned dry-dockings and repairs to critical systems.

Early, frequent, and clear communication between the vessel owner and the Coast Guard Examiner will alleviate most issues which arise during an ACSA examination.

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 will 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. Emphasis during the Annual Exam should be placed upon firefighting and lifesaving 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.

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 load line (when applicable) to the ACSA Coordinator, Troy.Rentz@uscg.mil. The ACSA Coordinator will forward the request to the appropriate district office and OCMI zone where the owner intends to have the ACSA Renewal Exam completed. See Annex 4 for sample request letter.

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 and vessels desiring to re-enter 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 13th 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 OCMI 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 OCMI 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 OCMI zone, effort should be made to expedite MISLE entry.

- If an ACSA vessel is transiting to another OCMI zone with outstanding deficiencies, scanned copies of all deficiency lists generated shall be emailed to the appropriate department / division / branch at the receiving OCMI zone as soon as possible to facilitate scheduling of follow-up examination activities.

OCMI 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 OCMI 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 OCMI has found the vessel to be in substantial compliance the OCMI 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 "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 request reconsideration of requirements issued by the attending USCG inspector to the Officer in Charge, Marine Inspection (OCMI) listed in the contacts section. If upon reconsideration, owners are still aggrieved by the decision or action, 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-CVC-3, in accordance with 46 CFR 1.03-25.

Consequences for non-compliance

Consequences may include:

- No-Sail deficiencies
- Revocation of the Fish Processing Vessel Certificate of Compliance
- Revocation of Exemptions from Classification and Load Line
- Captain of the Port Orders will be issued for conditions that immediately and adversely affect the safety/ seaworthiness of the vessel. COTP Orders have associated statutory penalties that will be referred to enforcement when violated.

Disenrollment from ACSA

When a vessel is not in substantial compliance with the agreement, is defined as:

1) There are overdue deficiencies regarding stability or critical systems; or
2) The vessel fails to complete required exams; or
3) Poor material condition of the vessel adversely affects the safety of the vessel or crew.

In such cases then, the OCMI / COTP may exercise one or more of the options in the following order:

1) Issue a "No Sail" 835 deficiency:
2) Issue a Captain of the Port Order (COTPO) per 33 CFR 160.111 authorities, controlling the vessel's movement (and subjecting the vessel to civil penalties);

3) Revoke the vessel's Certificate of Compliance (Coc) required under 46 CFR Part 28.710 and notify the NOAA observer program that the vessel's CoC is no longer valid;
4) Revoke the vessel's ACSA Exemption Letter from classification /and / or loadline

Each action or decision by the OCMI / COTP is subject to reconsideration and appeal if the vessel operator or owner is aggrieved. Appeals shall follow the process established above under "Appeals." If after these actions, the vessel owner continues to demonstrate non-compliance with the ACSA program, the Coast Guard OCMI may recommend to the District Commander that the vessel be disenrolled from the ACSA program.

The OCMI commences the disenrollment process with a brief to the District Commander on the recommendation to disenroll a vessel from the ACSA program. If the District Commander decides to disenroll an ACSA vessel based on the recommendation of the OCMI, an official letter will be sent to the vessel owner and will be scanned into the official Coast Guard database. The disenrollment letter will include the procedure for reconsideration and appeal of the District Commander's decision.

Note: a vessel voluntarily going into lay-up status will not be disenrolled. Vessels in lay-up are not required to be in substantial compliance but must complete all ACSA exams prior to being placed back into active service.

Dockside and At-Sea Enforcement Options

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 160.111should 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 (Commandant CVC-3, 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.

A – Administration	Interval	Reference
o **1. ACSA Exemption Letter** ❑ **ACSA Exemption Renewal Exam** — Confirm a renewal request letter is on file with Sector — USCG Examiner endorses Renewal Examination block on existing letter. ❑ **ACSA Mid-Period Exam** — Confirm the ACSA Exemption Letter is on board and valid. — USCG Examiner endorses ACSA Mid-Period Examination block.	Annual	ACSA Guide
o **2. Commercial Fishing Vessel Decal and Certificate of Compliance (COC).** ❑ **If conducted by a 3rd party organization** — Confirm a valid COC was issued within the past 2 years. — Confirm a valid Commercial Fishing Vessel Decal was issued within the past 2 years. ❑ **If conducted by the Coast Guard** — Exemption letter will be endorsed as satisfying the requirement for completion of the COC Exam. — 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.	Annual	CG-5587 CG-5587B ACSA Guide Annex 2
o **3. Valid Load Line Certificate? ___Yes ____No** ❑ **Issued by _____** **Issue date _____Exp. _____** **Annual endorsement date_____**	Annual	ACSA Guide

o **4. The following logged entries must be verified/signed by the Captain or Chief Engineer as appropriate:** ❑ Drills & training (*may refer to drill records for details*) ❑ Watertight door status and maintenance (*may refer to watertight door status log*) ❑ Testing of factory sump pumps & interlocks (when installed) ❑ Weekly bilge alarm testing	Annual	ACSA Guide
o **5. Station Bill** Designates each person's station & responsibilities ❑ Fire ❑ Flooding __Designates crewmembers to set watertight boundaries __Designates a crewmember(s) to operate dewatering equipment ❑ Abandon ship __Survival craft assignments ❑ Person overboard ***Note:*** *Safety sensitive duties should not fall primarily on untrained fish processors.* *o* **6. Licensing** Must have a Master, Mate, Chief Engineer, and Assistant Engineer; with appropriate endorsements for the tonnage and horsepower of the vessel to which they are sailing on. ❑ If vessel has been approved for automation in lieu of Assistant Engineer, automation check list must be used (see Annex 7)	Annual	ACSA Guide

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 8 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.

B - Stability		
o **1. Stability Instructions** ❑ Examine Stability Letter and Addendum ❑ Identifies the location of loading mark and draft marks ❑ Ensure master and engineer are familiar with stability instructions and addendum	Annual	46 CFR 28.530
o **2. Stability Addendum.** Examine stability addendum or LL-11D (on vessels with a load line) to ensure it identifies the following: ❑ Watertight bulkheads ❑ Watertight closures (location, size & type) ❑ Weather-tight closures (location, size & type) ❑ Coamings and vents (heights and locations) ❑ Automatic closure devices, operating stations for doors, hatches, scuttles, chutes, tank vents. ❑ Ventilation devices located on the main deck or above ❑ Sea valves: location, size, type, and remote operating stations. ❑ Size and number of freeing ports and drain lines provided.	Annual	ACSA Guide Section B or LL-11D
o **3. 5 Year Stability Review** ❑ Not greater than 5 years since last inclining or verification of stability by deadweight survey. ❑ Stability letter reviewed by Marine Safety Center	Every 5 Years	MSC Guidance
o **4. Factory Sump Pumps** ❑ 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. ❑ If no sump pumps are used because freeing ports and /or scuppers are used, this must be listed in the stability addendum.	Annual	ACSA Guide Section B
o **5. Stability Training** ❑ Unlicensed Masters have completed USCG accepted Stability Training (NPFVOA or AMSEA). *Implementation by December 31 2025.*		46 USC 4502 (g)(1)

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 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.

C - Drydock and Internal Structural Exam	Interval	Reference
o **1. Propeller(s)** o **2. Stern bushing(s)** o **3. Sea connections** o **4. Weldments.** Visually examine condition of all welds for (1) Washed out welds, (2) Cracking, (3) Excess pitting/corrosion o **5. Shell Plating.** Visually examine the condition of all shell plating which constitutes the watertight envelope.	Twice in 5 years not to exceed a 3-year interval	46 CFR 61.20-5 NVIC 7-68
o **6. Sea Chests** ❑ Open for examination ❑ Check all welds, plating and thru -hull penetrations	5 yrs	46 CFR 61.20-5
o **7. Sea Strainers.** Open for examination and clean	5 yrs	46 CFR 61.20-5(b)
o **8. Sea and Overboard Valves** ❑ 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 ❑ Valves located as close as possible to the side shell plating ❑ Valves are steel, bronze or other approved material ❑ Non-return valves removed and inspected ❑ Sea chest valves must be accessible from deck plate level without the use of reach rods. ❑ If deck plates cover or block access to sea valves, smaller access plates must be installed to provide access to valve handle and must be labeled	5 yrs	46 CFR 42.15-60 61.20-5 ABS rules 4-4-2/19 46 CFR 56.50-95
o **9. Valves for emergency bilge suction** (if equipped) ❑ Open for examination and examined ❑ Entering space below the deck plates to open/close valves is avoided ❑ If large plates are above valves, smaller access plates must be installed to provide access and must be labeled	5 yrs	46CFR 61.20-5(b)

C - Drydock and Internal Structural Exam	Interval	Reference
o **10. Internal Examination of Integral Fuel Oil Tanks** List or diagram of fuel tanks examined. ❑ _____ ❑ _____ ❑ _____ ❑ _____ ❑ _____ ❑ _____ _____	5 yrs	46 CFR 91.43-1
o **11. Examination of internal spaces** List or diagram of spaces examined provided. ❑ _____ ❑ _____ ❑ _____ ❑ _____ ❑ _____	Twice in 5 years not to exceed a 3-year interval	46 CFR 91.40-3a
o **12. Keel Coolers**	Twice in 5 years not to exceed a 3-year interval	46 CFR 56.50-96

C - Drydock and Internal Structural Exam	Interval	Reference
o **13. Ground Tackle** ❑ Ensure suitable for vessel ❑ Anchors and chain / wire rope ranged ❑ Operational test of windless and chain locker pumping arrangements. ❑ Chain to be gauged; Maximum wastage allowed is 12%	5 yrs	ABS Rules Part 2, Chap. 2
o **14. Hull Markings** ❑ Examine fore and aft draft marks ❑ Examine ACSA Maximum Loading Marks — Horizontal white mark 12 inches long,1 inch wide — Permanently marked by weld bead, punch marks or flat bar — Location as identified in the addendum to the stability letter — Port and starboard sides ❑ Examine Maximum Loading marks	Twice in 5 years not to exceed a 3-year interval	46CFR 97.40-10

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 load line, 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 load lined are required to be drydocked and have internal structural exams (ISE) conducted twice in any 5-year period with a maximum interval of 3 years. As such,

ACSA vessels with a valid load line 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 dry dockings and internal structural examinations of load lined 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, tail shaft(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 dry dockings or hull repairs.

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
o **1. Periodic gauging requirement** ❑ Obtain copy of gauging report ❑ Gauging shall include, but not limited to the following: — Three transverse sections in the midship 0.5L — Internals of the fore and after saltwater peak tanks — Wind and water strakes, port and stbd, full length — All exposed main deck plating & superstructure deck — Two shots on each bottom plate at the discretion of the attending Marine Inspector — Sea chests — Other suspected areas throughout the hull.	5 yrs	ABS Rules 7-3-2 NVIC 7-68

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**
o **1. Each tail shaft must be drawn & visually inspected as follows:**		46 CFR
❑ **Single tail shafts**	Twice in 5 yrs	61.20-17(b)
❑ **Multiple shafts**	5 yrs	61.20-17(c)
❑ **Tail shafts with oil lubricated bearings** ***need not be pulled*** as long as each of the following is done:	Need not be pulled	61.20-17(e)
— 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	
❑ **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.	5 yrs	61.20-17(d)
o **2. Tail Shaft Exam Item:** ❑ **Tail shafts with fitted keys** — NDT of forward 1/3 of the shaft's taper section and keyway — Visual examination of entire shaft ❑ **Tail shafts with a propeller fitted by means of coupling flange** — NDT coupling flange, fillet at propeller end, coupling bolts — Visual examination of entire shaft	See D 1. For intervals	61.20-18(b) 61.20-18(c)
o **3. Rudder and Rudder Shaft Examination, to include but not limited to the following:** ❑ Ensure rudder bearing clearances are within manufacturer's specifications.	Twice in 5 yrs not to exceed 3 yr int.	
❑ 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	ABS Rules Part 3-2-11

o 4. Examination requirements for tail shaft bearing wear-down (Check Applicable Box)

Twice in 5 yrs not to exceed 3 yr interval

46 CFR 61.20-23(a)

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

— Propelling machinery located amidships: 61.20-23(a)(1)

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: 61.20-23(a)(2)

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)		7.93 m (0.3125 in)

❑ Rubber water lubricated bearings must be refurbished when any water groove is ½ the original depth. 61.20-23(b)

❑ 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. 61.20-23(c)

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.

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,
- 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)		7.94 m (0.3125 in)

Rubber water lubricated bearings must be refurbished when any water groove is ½ 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.

F - Watertight and Weathertight Integrity	Interval	Reference
o **1. All watertight/weather tight closures as listed in the stability addendum or ABS LL-11d:** ❑ Closures clearly labeled/identified & correlate to stability addendum or ABS LL-11d ❑ Labeled "Opening authorized for transit only – keep closed at sea" ❑ All dogs operable __ Strike at least 1/3 of wedge without the use of a wrench __ Dogs move downward for closure ❑ Chalk or light tested for fit and watertight integrity ❑ Seal not painted, badly cracked or deteriorated ❑ Examine sealing edge of closure frame. Door frame/door not warped/knife edge not painted	Annual	ACSA Guide Section F Discussion ABS LL-11d
o **2. All closures listed in stability booklet addendum shall have administrative controls for managing the status as listed below:** ❑ Closing watertight doors at sea enforced by master & mates. ❑ Detailed preventive maintenance schedule for each of the closures listed. ❑ Written instructions for at-sea security watches. ❑ Each closure listed must include required closure status for at least the following vessel conditions: — When the vessel is in transit — When the vessel is actively fishing/processing — When idle on the fishing grounds	Annual	ACSA Guide Section F Discussion

F - Watertight and Weathertight Integrity	Interval	Reference
o **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:** ❑ If watertight door: — Minimum coaming height 3 inches — Shall be six-dog "quick acting" type ❑ If weathertight door — Minimum coaming height 24 inches	Annual	ACSA Guide Section F Discussion
o **4. Factory space high water alarms** ❑ Installed in each corner of the factory **or** ❑ Installed in an alternate arrangement approved by the OCMI ❑ Alarm at water level greater than 6 inches ❑ Time delay (up to 5 seconds) may be allowed ❑ Visual alarm — Installed in the factory — Installed at the machinery control flat — Installed in the pilot house at pilot station instrument panel ❑ Distinctive indicator *(not to be confused with general alarm)* ❑ Audible alarm in pilot house	Annual	ACSA Guide Section F
o **5. Vents** ❑ Ensure vent heights are min 30 inches above the main deck ❑ Examine condition of closures ❑ Examine vent balls and seats **Fuel tank vents** ❑ Inspect flame screen (minimum 30 X 30 mesh) ❑ operation and seating of ball check valves	Annual	46 CFR 42.15-50 56.50-85(a)7 &8
o **6. Below deck watertight doors, hatches and bulkheads** ❑ Existing internal watertight subdivision shall be maintained or restored to original condition — Watertight bulkheads — Bulkhead penetrations — Watertight doors	Annual	ACSA Guide section F

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.

G - Machinery systems	Interval	Reference
○ **1. Fuel System** Fuel supply piping on the pressure side must be: ❑ Seamless piping of steel, annealed copper or brass or tubing or nickel copper meeting the requirements for materials and for thickness ❑ Non-metallic flexible hose allowed only where flexibility is required to prevent damage from vibration. Such hose must not be more than 30 inches in length. ❑ Fuel / hydraulic hoses meet J-1942 or SAE J-1942-1. ❑ Hose fittings meet SAE J-1475. ❑ Approved fire sleeve material as listed in the SAE qualified hose list installed over approved hose.	Annual	46 CFR 56.60 56.50-70 (a)(2) 56.60-25 (b)
○ **2. Sight gauges on tanks** ❑ Must be welded or brazed to the tank ❑ Must be heat resistant material ❑ Protected from mechanical damage ❑ Both ends of sight gauge must be fitted with devices that will automatically close should the gauge break	Annual	58.50-10 (a)(6)
○ **3. Main Propulsion Machinery Testing** ❑ Obtain copy of the written test procedures ❑ Test automatic shut-down on over-speed *(if installed) ❑ Test low lube oil pressure alarm and shut down ❑ Test jacket water high temperature alarm ❑ Maintained to manufacturer's specifications	Annual	46CFR58.05-10 Table 62.35-50 ABS Rules: 4-7-1

○ **4. Electrical and Auxiliary Prime Mover Testing** ❑ Obtain copy of written test procedures ❑ . Test over speed device so that the speed cannot exceed the maximum rated speed by more than 15% If automated, provide calibration standards set by the manufacturer. * ❑ Test alarm and shutdown of low lube oil sensor ❑ Test jacket water high temperature alarm ❑ Maintained to manufacturer's specifications	Annual	46CFR 111.12-1 (b)&(c)
○ **5. Reverse Power Relay Test Generators** Test reverse power relays or mechanical interlock.	Annual	ACSA Guide Section G

○ **6. Preventative Maintenance Records** ❑ At the request of the examiner the owner/operator will provide preventive maintenance records for propulsion and electrical generation machinery.	Annual	ACSA Guide Section G
○ **7. Fire safety hazard survey** ❑ Conduct survey of machinery spaces to identify fire safety hazards.	Annual	ACSA Guide Section G
○ **8. Electrical wiring on main engines** ❑ Electrical cables connecting starting batteries to main propulsion starters ❑ Cables connecting main propulsion engines to generators — Must meet IEEE Std 45, IEC 92-3, MIL-C-24640A or MIL-C-24643A(2) — The use of electrical welding cables is not authorized	Annual	46CFR 111.60-1(a)

○ **9. Vital System Piping:** ❑ Examine fuel oil for main propulsion / emergency generators ❑ Examine lubricating oil systems ❑ Examine cooling water for main propulsion / emergency generators ❑ Examine bilge and ballast systems __Verify the operation of fixed bilge pump(s) to ensure they are capable of self-priming and taking suction from the furthest spaces from where the pumps are installed. ❑ Examine starting and control air systems ❑ Examine fire main and firefighting systems	Annual	46CFR 56.07-5(f) 56.50-1 56.50-60 56.50-80 56.50-95 56.50-57 56.50-15 56.70

○ **10. Non-metal expansion joints** ❑ External: Examine 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	Annual	46 CFR 61.15-12
○ **11. Pressure Vessels** (Compressed air receivers >5 CF) ❑ Internal and external examination ❑ Data plate or stamped data is legible ❑ Hydrostatic testing unless examined internally by a marine inspector & no defect found which would impair the safety of the pressure vessel. As an alternative, ultrasonic testing may be conducted on the lower 1/3 of the pressure vessel and at the marine inspector's discretion. ❑ Relief Valves tested: Set to relieve at or below MAWP	5 yrs 5 yrs Twice in 5 yrs	46 CFR 61.10-5 54.15-5
○ **12. 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. ❑ Guards shall be installed in way of all rotating machinery/equipment. ❑ No device used for hanging clothing or any other combustible material, in way of heaters.	Twice in 5 yrs	46 CFR 28.215

○ **13. 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. ❑ Power strips shall not be used, except for a temporary basis and not used for general purpose power distribution. If used, they must be rated for marine use and in no circumstance will daisy chaining be allowed.	Twice in 5 yrs	UL NFPA

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

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. Vital Piping Systems: The vessel owner will notify the local OCMI as soon as possible for any unplanned or emergency repairs to vital piping systems listed in item 9.
It is not the intent of this inspection item to require wholescale 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 9 must be with approved procedures using certified welders

10. 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.

11. None

12. 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.

13. 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.

H - Life Saving Equipment & Arrangements	Interval	Reference
o **1. Liferafts** ❑ Liferafts approved under 46 CFR 160.151. ❑ Mounted so can be manually launched by one person.	Annual	ACSA Guide Sect. H 1
o **2. Liferaft Embarkation ladders** ❑ Must be installed for each life raft embarkation station that is five feet or more above the waterline in normal operating conditions ❑ Embarkation stations provided with a means to affix embarkation ladder to a welded pad eye or other suitable structurally sound device ❑ Each embarkation ladder lowered and inspected	Annual	Sect. H 2
o 3. Immersion Suits ❑ Immersion suits maintained to manufactures specifications ❑ Each immersion suit is required to be fitted with a Coast Guard approved strobe type PML.	Annual	NVIC 1-08 Sect. H 3

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.

I-Fixed Fire Fighting Equipment & Arrangements	Interval	References
o **1. Spaces requiring a fixed firefighting system** ❑ Any space containing: — Internal combustion engine greater than 50 hp — An incinerator — Gasoline storage tank(s) or other flammable materials — Paint lockers over 60 cubic feet in volume	Annually	46 CFR 28.320(a)
o **2. Engineered fixed fire extinguishing systems for main engineering spaces shall be:** ❑ Installed in accordance with 46 CFR 76.15 and other appropriate NFPA standards.	Annually	46 CFR 76.15 NVIC 6-72
o **3. Spaces protected by fixed CO2 systems OF NOT more than 300 lbs.** *CO2 cylinders may be located inside the space protected.* ❑ If cylinders are located inside the space protected: — a heat actuator is required that will automatically operate in addition to the remote pulls ❑ If cylinders are stored in a CO2 room: — Room must be well ventilated — Must not be located where ambient temp exceeds 130 deg. F — Cylinders must be securely fastened and supported ❑ Controls must be located outside the space protected ❑ Not located in an area that could be cut off or made inaccessible in the event of fire in the space protected ❑ Complete but simple instructions for operation of the system must be located in a conspicuous place near pull boxes and at the control station located at the cylinder location ❑ Alarm and time delay is required unless space is small and there is suitable horizontal escape from the space ❑ Perform functional test ❑ Cylinders weighed ❑ System must alarm for at least 20 seconds before CO2 is released ❑ Ventilation — Protected spaces with mechanical ventilation must automatically shut down on activation of the CO2 system. — Means for closing all openings to the space protected must be provided and must be able to be accomplished from outside the space.	Annually	46 CFR 76.15-20(b) 76.15-10(a) 76.15-20(b) 76.15-20(a) 76.15-20(b) 76.15-20(d) 76.15-10(a) 76.15-10(h) 76.15-10(f) 76.15-35(a) 76.15-35(c)

o **4. Spaces protected by fixed CO2 systems OF MORE than 300 pounds** ❑ CO2 cylinders must be stored outside the space protected ❑ Controls must be located outside the space protected ❑ Not located in an area that could be cut off or made inaccessible in the event of fire in the space protected ❑ Complete but simple instructions for the operation of the system must be located in a conspicuous place near pull boxes and at the control station located at the cylinder location ❑ Alarm and time delay is required ❑ Perform functional test ❑ Cylinders weighed ❑ System must alarm for at least 20 seconds before CO2 is released into the space. ❑ Ventilation — Protected spaces with mechanical ventilation must automatically shut down on activation of the CO2 system. — Means for closing all openings to the space protected must be provided and must be able to be accomplished from outside the space.	Annually Annually	46 CFR 76.15-20(a) 76.15-10(a) 76.15-10(f) 76.15-35(a) 76.15-35(c)
o **5. Pre-engineered fire extinguishing systems** May be used in place of fixed CO2 systems provided they are qualified by the restrictions and standards set forth in 46 CFR 28.320 ❑ Spaces less than 33.98 cubic meters (1200 cubic ft.) that are normally unoccupied i.e.: — Small main engine spaces — Paint / flammable storage lockers ❑ Must be approved by Commandant for the intended application ❑ Capable of manual activation from outside the space in addition to any automatic actuation devices. Automatically shut down all power ventilation to the space protected. ❑ A visible and audible alarm must sound at the vessel's operating station, indicating discharge	Annually	46 CFR 28.320(d) ACSA Guide Section I
o **6. Heat detectors in spaces containing fixed gas fire extinguishing systems** ❑ Heat detector (rate of rise / maximum temperature) must be installed in each space protected by a fixed gas fire extinguishing system	Annually	46CFR 161.002

o **7. Smoke Detectors for accommodation spaces** ❑ Acceptable detectors include: — Independent modular smoke detector: Must meet UL-217 standards. — Smoke actuated fire detecting unit: Must be installed IAW 46CFR76.33.	Annually	ACSA Guide section I discussion
o **8. Structural fire protection** ❑ A-0 boundaries must isolate all internal combustion machinery spaces.	Annually	ACSA Guide section I discussion
o **9. Non-combustible insulation.** ❑ Any insulation replaced in hidden spaces must be of non-combustible material IAW 46CFR Subchapter Q. ❑ If foam insulation is replaced it must be USCG or ABS approved material.	Annually	ACSA Guide section I discussion

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.

3-6. None

7. 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.

8. 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.

9. Non-Combustible Insulation

Any exceptions are at the discretion of the local OCMI.

J - Other Fire Fighting and Safety Equipment	Interval	Reference
o **1. Emergency Lighting** o Locations sufficient for emergency egress o Test reserve power supply o Installed to illuminate, control stations and main/emergency switchboards	Annual	46 CFR 199.110, 46 CFR 112.43 ACSA Section J
o **2. Portable fire/dewatering pump** ❑ Must be independently powered ❑ Must be stowed outside the engine room ❑ Suction hoses must be capable of reaching into the bottom of all spaces. ❑ Internal combustion engines must have a means of venting the exhaust outside the space. *(It is acceptable to install a standpipe extending to the bilges for connection to the intake of the portable dewatering pump)* ❑ Sufficient suction hose w/foot valve to reach water from highest lift ❑ Sufficient 1.5-inch fire hose to reach any part of the vessel ❑ Hose(s) fitted with nozzle of corrosion resistant material capable of providing solid or straight stream, and spray pattern ❑ Pump capable of producing two effective 40-foot streams with "Y" gate valve from standard 1.5-inch fire hose	Annual	ACSA Guide Section J
o **3. Firefighters' Outfits** ❑ Vessels with less than 26 people aboard shall have 2 outfits ❑ Vessels with 26 or more people aboard shall have 4 outfits ❑ NFPA Firefighter outfit shall include: — One positive pressure SCBA — Protective clothing with retro-reflective tape — Rigid helmet — Gloves — Boots — With attached lifeline — Fire axe (or another appropriate tool) ❑ Each SCBA will be provided with two spare air bottles	Annual	ACSA Guide Section J 46 CFR 96.35

o **4. Crew training** ❑ Each fire team member (as identified on the Emergency Instructions as required by 46 CFR 28.265) who will wear the firefighter outfits shall provide proof of Coast Guard approved basic fire training.	Annual	46 CFR 28.265
o **5. Fire and Safety Plan** ❑ Up to date Fire and Safety Plans *audited every 5 years* ❑ General arrangement plans showing — Each control station for controlling ships radios, main navigation, emergency power, and where fire reporting and fire control equipment are centralized — Location of fire resisting bulkheads — Location of alarms — Location of extinguishing systems — Location of portable fire extinguishers — Means of access to different compartments and decks — Ventilation system and location of ventilation shutdowns and dampers — Details of alarms systems — Details of extinguishing systems — Life raft embarkation stations	Annual	ACSA Guide Section J 46 CFR 91.55-5(d)
o **6. Freon detectors:** ❑ Installed in spaces containing main receiver and compressors ❑ Portable Freon detectors shall also be on board ❑ Must be calibrated within the manufacture's specifications.	Annual	ACSA Guide section J
o **7. CO2/Halon detection system** ❑ Installed in any accommodation space where gas cylinders are stored ❑ Test the function of the gas detection system	Annual	NFPA 12 Chapter 4.3.3.1.1

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

6. 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.

7. 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.

<table>
<tr><th>K - Emergency Drills and Training</th><th>Interval</th><th>Reference</th></tr>
<tr><td>o 1. Emergency drills must be conducted by a trained individual in the presence of a USCG Examiner, to include but not limited to:
❑ Fire
❑ Flooding
__Includes setting of watertight boundaries
__Team members demonstrate ability to properly rig, operate and dewater the most critical spaces below the waterline
❑ Abandon ship
__ Including donning of immersion suits
❑ Person overboard</td><td>Annual</td><td>46 CFR

28.275

28.270</td></tr>
<tr><td>o 2. Required number of qualified drill conductors in crew complement

<table><tr><th>Persons on board</th><th>Certified Drill Conductors</th></tr><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></table></td><td>Annual</td><td>ACSA Guide Section K</td></tr>
</table>

o **3. Record keeping of emergency drills and training** ❑ Logged by the master — Includes date of each drill — Conducted not more than 30 days from previous drill — Log should indicate those that did not participate and why — Summary of what happened during the drill — Must be maintained on board for 1 year and in the main office for 3 years ❑ Records of drills and instruction include at least the following contingencies: — Abandon ship — Launching survival craft — Donning immersion suits or PFDs — Making voice radio distress calls/using visual distress signals — Recover person overboard — Activating general alarm — Reporting inoperative alarm & fire detection systems — Minimizing effects of accidental flooding — Fighting a fire — Donning firefighters' outfits / SCBAs if equipped	Annual	ACSA Guide Section K 46 CFR 28.270
o **4. Communications among crew** ❑ Vessel has AMSEA or NPFVOA safety videos tapes / CDs that provide training on emergency procedures for non-English speaking crew.	Annual	ACSA Guide Section K

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.

L – Emergency Communications and Navigation	Interval	References

1. Notification prior to discharging fixed systems ❑ If vessel policy requires notification of the Master prior to fixed system activation then: — Must have clear written procedures — Signed by Master and Chief Engineer	Annually	ACSA Guide Section L
2. Fixed System emergency communications equipment ❑ Installed communication system between activation control station and wheelhouse must be installed or ❑ Emergency handheld radios may be used to meet this requirement. — Radios are stowed upon the bridge and at the controls to the fixed firefighting system.	Annually	ACSA Guide Section L
o **3. Automatic Identification System (AIS)** ❑ Must have an approved AIS installed and operational	Annually	ACSA Guide Section L
o **4. Global Maritime Distress Signal System (GMDSS)** ***Fish Processing Vessel 300 GT and over:*** ❑ Search and Rescue Transponder (SART) — < 500 GT 1 SART — ≥ 500 GT 2 SARTs ❑ 3 VHF handheld transceivers NOTE: A transceiver permanently installed in a life raft may be counted toward this requirement — Must operate on channel 16 and one other channel (channel 6 recommended) ❑ 2 VHF radio installation — Capable of operating on: - Channel 6 (156.3 MHz), - Channel 13 (156.65 MHz); and, - Channel 16 (156.8 MHz) ❑ 1 MF radio installation (Single Side Band) — Capable of operating on 2 frequencies between (1605-3500 kHz) ❑ 1 NAVTEX receiver	Annually	ACSA Guide Section L

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 firefighting system into the engine room, vessel owners shall install an independently powered emergency communication system between the wheelhouse and the controls to the fixed firefighting 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 firefighting system.

3. None

4. None

Annex 1 – Product Codes

The products listed below are identified by the National Marine Fisheries Service
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 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. 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 destine 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

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)	*Every two years*					
A	ACSA Exemption Renewal Examination				*Every Two Years*		
A	ACSA Mid-period Examination				*Annually*		
A	Certificate of Compliance or Coast Guard exam to include (46 CFR 28) (33 CFR 151 & 155)		*Annually*	*Annually*	*Annually*	*Annually*	
B	Stability Tests & Reports		*5 Years*				*5 Years*
C	Hull Audio Gauging				*5 Years*		
D	Drydock / Internal Structural Exam				*Twice in 5 Years, NTE 3 Years*		
E	Tail Shaft Exam				*See sec. D*		
F	Watertight & Weather-tight Closures				*Annually*	*Annually*	
G	Machinery Inspection				*Annually*		
H	Life Saving Arrangements				*Annually*	*Annually*	
I	Fixed Fire Fighting Arrangements				*Annually*	*Annually*	
J	Other Fire Fighting Equip & Plans				*Annually*	*Annually*	
K	Emergency Drills & Training				*Annually*	*Annually*	
L	Emergency Communications				*Annually*	*Annually*	

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:

Load line

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[1]*.

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.

[1] 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.

Annex 4 – Sample Renewal Request Letter

Company letterhead

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To: Commander (dpi) U.S. Coast Guard District 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

*Ensure you include the address where you want the Exemption Letter mailed

*Please submit this request by e-mail: troy.rentz@uscg.mil

Annex 5 – Sample COC & ACSA Exemption Letter

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: (dpi) Phone: 206-220-7216 FAX: 206-220-7225

16716

The Cod Fishing Company Inc
5615 1st Ave. West
Seattle, WA 98199

BERING COD (ON 545699) Certificate of Compliance & Exemption

Dear Sir:

You requested exemption for this vessel from the requirement of 46 CFR 28.720 to be classed and from 46 CFR Subchapter E requirements for Load Lines. This request was in accordance with the Alternate Compliance and Safety Agreement (ACSA) Program as described in Commandant (CG-543) Policy Letter 12-01. This application constitutes acknowledgement that the subject vessel operates as a fish processing vessel as defined in 46 CFR Part 28. On January 10, 2021, you completed all requirements to remain in the ACSA program.

In accordance with 46 CFR 28.60, I hereby grant the subject vessel exemption from the requirements of 46 CFR 28.720 and 46 CFR Subchapter E. The vessel is hereby issued this Certificate of Compliance (COC). This allows the vessel to continue to operate as a fish processing vessel to produce only those products listed as "H & G" and "Beyond Minimal Processing" in Annex 1 of the Guidance for the ACSA Program. This exemption does not allow for the processing of products listed as "Extensive Processing" in that Annex. This exemption shall expire January 10, 2025 unless terminated earlier.

Required Examinations: To remain valid, this vessel must comply with the agreement and complete examinations listed below and recorded on enclosure 1:

ACSA Mid-period *(within 60 days of)*	January 10, 2024
Dockside exam *(within 60 days of)*	January 10, 2024
ACSA Exemption Renewal exam ***(request 60 days prior)***	January 10, 2025
ACSA Dry-dock exam *(commenced by)*	January 31, 2025
Incline test or deadweight survey *(completed by)*	January 4, 2025

Vessel specification:

Year Completed	1975
Gross tons (GRT)	1215
Length	205.7 Feet
Horsepower	3600

Waters	Route	Gear Type
Cold	Greater than 100nm	Trawler – Catcher Processor

Vessel Manning:

USCG Credentialed	
Master	1
Mate	1
Engineer	1
Assistant Engineer	1
Drill Conductors	4
Trained Firefighters	4
1st Aid & CPR Certified	2
Total persons allowed	32

Required Equipment:

Survival craft:	SOLAS A, Capacity for the number of persons onboard
Distress Signals:	3 - Hand Flares / 6 - Parachute Flares / 3 - Smoke
PFDs:	Immersion Suits Adequate size and number for all persons onboard
Ring Buoys:	3 at least 1 with light and 1 with line attached
EPIRB:	1 - Category I
Communication Equipment:	1 - VHF / 1 - SSB

Stability: The vessel's master is responsible for maintaining satisfactory stability at all times. This requires thorough understanding of the vessel's stability book, reliable high water alarms to alert of water intrusion and close attention to vessel loading conditions. The Master must ensure closure status of watertight & weathertight openings in compliance with the stability book.

This original certificate and the enclosure shall be posted under glass or other suitable transparent material in the wheelhouse so that all pages are visible.

If you have questions or require further assistance, please contact Mr. Troy Rentz, Commercial Fishing Vessel Safety ACSA Coordinator, Thirteenth Coast Guard District, at (206) 220-7216 or Troy.Rentz@uscg.mil.

Sincerely,

Captain, U.S. Coast Guard
Prevention Chief, Thirteenth Coast Guard District

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 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	• Designed & constructed in accordance with ABS Rules for ocean service	• Many ACSA vessels were not originally built to ABS standards. However, the robustness of their hull construction has been demonstrated by years of service. ***The objective, therefore, is to preserve their inherent robustness.***
		• Must undergo hull & structural gauging as part of ACSA enrollment. Excessively corroded members (i.e., more than 25% loss) must be replaced unless calculations show that remaining thickness exceeds ABS minimum standards.
	• Maintained in accordance with ABS structural requirements & corrosion limits	• Similar to ABS standards
	• Drydocked every 5 years for inspection	• Drydocked twice in 5 years *(not more than 3 years between drydockings)*
	• Audiogauging of hull (plating and stiffeners) as required by ABS. Extent of gaugings increases as vessel ages *(especially after 15 years)*	• Similar to ABS standards

Seaworthiness element	Load Line requirements	ACSA requirements
Weathertight integrity *Coamings* *Exposed doors, hatches, vent covers, etc*	• Critical vents, air pipes, doorways protected by coamings *(6" to 24" high, depending on location)*	• 24-inch coamings required on Main Deck doors located in aft 1/3 of vessel; other existing comings may have to be increased
	• Documented list of closures	• Documented list of closures
	• Inspected annually	• Inspected Annually
Watertight integrity of hull penetrations *(valves & associated piping systems)*	• Documented list of penetrations	• Documented list of penetrations
	• Inspected during drydockings *(i.e., every 5 years)*	• Inspected every other drydocking *(i.e., every 5 years)*
Reserve buoyancy & prevention of overloading	• Draft limit determined by freeboard assignment or stability calculations *(whichever is more severe)*	• Draft limited by stability calculation
	• Limiting draft marked on hull with midship load line marks.	• Maximum draft marked on hull with special midship marks
Stability	• Must meet appropriate stability criteria	• Must meet appropriate stability criteria
	• Easy-to-use stability & loading instructions must be provided for master	• Easy-to-use stability & loading instructions must be provided for master
	• Must have valid stability documentation	• Must have valid stability documentation
		• Must have been inclined within previous 5 years of ACSA enrollment
	• Stability is reassessed only if modifications result in significant weight changes	• Stability must be reassessed every 5 years *(must be re-inclined unless a deadweight survey confirms that no weight changes have occurred)*
Rapid drainage of boarding seas	• Bulwarks must have adequate arrangement of freeing ports *(specific requirements regarding location, size)*	• Existing freeing ports might have to be upsized *(must be sufficient to allow rapid clearing of water in all probable conditions of list & trim)*

Annex 7 – Automation in Lieu of Assistant Engineer

U.S. COAST GUARD

Instructions/Check-list for Automation in Lieu of Assistant Engineer for Fishing Vessels with Approved Plans

1. **Purpose:**

For considering automation measures in lieu of providing an assistant engineer, the following is a list of the minimum acceptable measures to be put in place on vessels of not more than 5,000 GRT and having not more than 16 individuals onboard, primarily employed in the preparation of fish or fish products.

For vessels with a crew designation of having 16 or less individuals on board who are primarily involved in the preparation of fish or fish products, supporting documents may be required to verify this arrangement. Companies will need to provide crew manifests going back two years indicating crew arrangement and Sea Days Letters for critical crew members who are not primarily involved in the preparation of fish or fish products. This work instruction contains guidance/check list for procedures for completing verification of required items to insure they function as designed in order to be incompliance with the approved plan for "Automation in Lieu of Assistant Engineer.

Commercial vessel safety exams are only required on fishing vessels every five years, however to comply with these minimal items of automation deemed acceptable by the Officer in charge Marine Inspections (OCMI) of Coast Guard Sector Puget Sound in cooperation and concurrence with District 17 (D17) a biennial vice quinquennial safety exam to include verification, Automation" is still functioning as designed is required.

2. **References:**

a. CG-CVC Policy Letter No.11-11, CH 1
b. Vessel's Coast Guard approved automation letter

3. Procedures:

	Y	N
Remote start of the fire pump from the bridge operating station (Ensure operation by engaging start/stop button and verify pump is operational by witnessing a stream capable of producing an effective distance of 40 feet by at least one fire hose).		
Flooding alarms installed (Flooding alarms must be installed in all spaces that have through hull fittings, and in all cases including steering lazarettes. Test each alarm for function and that it is indicated on the comprehensive alarm monitoring panel).		
Installed communications (Installed communications shall be hardwired to the Chief Engineers stateroom and tested for function. If the stateroom is adjacent to the bridge operating station this may be omitted if in the opinion of the examiner/inspector the intent is met for direct line of communications is clear)		
Fuel supply cut off (fuel supply cut off shall be located outside the engine room and tested for its function. The intent is that fuel entering the engineering space can be secured from the source and can be accomplished by mechanical reach rods, hydraulics, pneumatic, electric or cable actuation of the service valve)		
Ventilation shut off[1] (Ventilation shut off shall be located outside the engine room and tested for its function. If vessel does not have forced ventilation installed this does not apply).		
Heat detectors[1] (Heat detectors shall be of sufficient number for the size and layout located in way of engine room).		
Smoke detectors[1] (Smoke detectors shall be located in way of accommodations spaces and tested for their function).		
Fixed firefighting[1] (A Fixed fire suppression system shall be installed in any space containing an internal combustion engine greater than 50 hp, gasoline storage tank (s) or other flammable materials and paint lockers over 60 cubic feet in volume). **Cameras** (A sufficient number of cameras located in main and auxiliary machinery spaces including the steering compartment/lazarette shall be installed with a monitor located at the bridge operating station for easy viewing by the master or mate on watch. This is effectively the eyes replacing the second licensed engineer).		
Comprehensive alarm monitoring system (An alarm system that can be remotely monitored from the operating station and Chief Engineer's stateroom, much like the Night-Watch system currently installed on several vessels in the fleet. Test for function by verifying when at a minimum, fire and bilge alarms have been activated)		

[1] If a third party vendor has tested or inspected the item, verify by reading third party report.

Annex 8 – Sample ACSA Vessel Lay-up Request

Company letterhead

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Date

USCG Thirteenth District (dpi)
Fishing Vessel Safety, ACSA Coordinator
915 Second Ave, Room 3506
Seattle, WA 98174-1067

Re: F/V BERING COD

Sir:

According to our records the F/V BERING COD Official Number ###### is due for an ACSA Renewal exam on MM/DD/YYYY and a dry-dock exam on May MM/DD/YYYY.

Currently the vessel is tied up at location_____, and we do not plan on operating the vessel in the coming year(s). We ask that the vessel be placed in lay-up status. We understand the vessel must complete all ACSA examinations prior to being placed back into service. We will reach out at least 60 days prior to operating to schedule all required examinations.

Sincerely,

Name
Position
Company

*Please submit this request by e-mail: troy.rentz@uscg.mil