

# Alternate Compliance and Safety Agreement Meeting Notes

*NPFVOA classroom - 1900 West Emerson Suite 101  
Seattle, WA 98119 - (206) 285-3383*

23 June 2010

## ❖ **Welcome - 3rd Annual Meeting between USCG and ACSA Stakeholders**

- Host NPFVOA - facility brief, Karen Conrad - Executive Director
- Round of Introductions, led by Dan Hardin: went around the room with introductions.
- Meeting was attended by 41 people representing ACSA vessel owners and operators, Freezer Longline Coalition, Groundfish Forum, Jensen Maritime, Commercial Marine Service, NIOSH, USCG representatives from Headquarters, Pacific Area, Sector Seattle, Sector Anchorage, MSD Dutch Harbor, District 17 and District 13.

## ❖ **ACSA Status Brief, Troy Rentz, USCG Thirteenth District ACSA Coordinator**

- 51 vessels currently enrolled in ACSA.
- Inspection numbers since last meeting (June 09 - June 2010):
  - 17 dry-dock exams
  - 43 ACSA exams (exemption renewal exams and mid-period exams)
  - 439 discrepancies found and corrected
- 37 ACSA Exemptions Letters renewed.
- Marine Casualties on ACSA vessels June 09-June 2010:
  - 0 Major Marine Casualties
  - 6 Serious Marine Incidents
    - 2 deaths (1 fall overboard, 1 suicide),
    - 1 vessel flooding
    - 3 injuries (1 head and 2 back)
  - 16 routine reports for data collection
- Accomplishments:
  - Program implementation is complete.
  - All modifications from last year's meeting have been implemented.
  - Numerous safety improvements have taken place, the fleets are safer
  - ACSA has been recognized by lawmakers as a model program, may be extended to other fleets (outside of this region) following ACSA's lead but tailored to region-specific operations and risks.
- Current projects:
  - Updating the ACSA Guide
  - Working on article about ACSA for Proceedings Magazine (benefits/history of ACSA)
  - Consolidating ACSA information into one easy-to-use internet site
- Future plans:
  - Continue once-yearly meetings
  - Continue communications projects to highlight the benefits and accomplishments of the ACSA the program.
- Goal: increase hazard communication, Mr. Rentz brought safety publications for attendees to use onboard ACSA vessels, emergency guides/signs/instructions/safety training videos in English/Spanish/Vietnamese.

❖ **General Announcements:**

- Coast Guard, Sector Seattle, Marty Teachout:
  - Paul Tramm new Sector Seattle ACSA Inspector (only contact for the month of July).  
Phone: (206) 217-6896 e-mail: [Paul.T.Tramm@uscg.mil](mailto:Paul.T.Tramm@uscg.mil)
- Coast Guard Headquarters, Jack Kemerer, COMDT CG-5433:
  - Encouraged continuing with ACSA meetings as long as the program continues. Important to recognize that industry and government are both stakeholders, in the ACSA program.
  - The ACSA program has improved preventive maintenance, led to a reduction in down time and increased operating efficiency.
  - Look out for a number of significant changes to the commercial fishing industry vessel safety program that may occur as the Coast Guard re-authorization bill is negotiated by Congress.
  - Alaska Ranger investigation has been signed, families will have to be notified and then it will be available
  - [www.fishsafe.info](http://www.fishsafe.info) updated & redesigned - gateway into Homeport website, always open to comments/suggestions.
- Coast Guard, District 17 Alaska, LCDR Brad Clare:  
Encouraged stakeholders to engage Sector Anchorage more often with ACSA examinations and reporting inoperable equipment. Even though there is a lot of turn-over, Sector Anchorage still wants to help vessels that operate throughout Western Alaska.
- Freezer Longline Coalition, Kenny Downs:  
The Coalition considers ACSA a success overall, Supported the partnership working together in the cooperative ACSA program. Stated that maintaining current, well referenced policy guidance was extremely important to the industry. ACSA guidance will help vessels stay in compliance; reduce workload and the number of follow-up inspections required.
- Groundfish Forum , Lori Swanson:  
Thankful for the program, many vessels covered by the forum would not qualify for classification; without ACSA the vessels would not be able to continue processing operations. With the new vessel replacement provisions in Amendment 80 the forum hopes to see some vessel replacements in the next few years.
- Cascade Fishing:  
Commented that Sector Seattle ACSA Inspector was overworked and that scheduling exams was often difficult. Dan Hardin responded; Robin and Paul have been hired to help out, also working to have Mr. Rentz assist with examinations. Reminded vessel owners and operators to schedule examinations as far in advance as possible to help manage the work schedule.

❖ **Lessons learned from the Alaska Ranger and Katmai marine casualties**, Dr. Paul Anderson, National Institute for Occupational Safety and Health (NIOSH) - Alaska Pacific Regional Office (APRO) - Anchorage, Alaska:

- Dept. of Health and Human Services division, missions and area of expertise are occupational safety and health research and communication. NIOSH is separate from OSHA with different missions (not OSHA enforcement).
- NIOSH investigates incidents by interviewing survivors, analyzing results, examining recovered safety gear, and reviewing national safety policy, but does not focus on vessel or liabilities; it focuses on people and behaviors (safety training and equipment).
- 2008 - 2 catastrophic vessel sinkings

- FV Alaska Ranger (March 23)
  - 5 out of 47 people on board did not survive (11%)
  - all on vessel donned immersion suits
  - 47% entered life rafts
  - 53% went in the water
  - 4 bodies recovered, 1 remains missing
  - Strobe lights were essential, only thing able to guide rescuers to survivors
  - Liferrafts were USCG/SOLAS approved under 46CFR 160.151
  - Vessel was equipped with relatively new immersion suits
  - 9 out of 47 POB received formal safety training
- FV Katmai (October 22)
  - 7 out of 11 people on board did not survive (63%)
  - 10 out of 11 POB donned immersion suits
  - 1st raft: 7 people made it into the raft. 3 were thrown from raft and drowned, when it overturned repeatedly in heavy seas 4 crew survived 17 hrs at sea.
  - 2nd raft: 3 people tried to launch this raft at mid-ship, apparently failed to launch successfully. Raft was found empty, only partially inflated.
  - Older immersion suits (>15 years)
  - Older rafts (1980.1995)
  - Coastal Liferrafts approved under 46CFR 160.051 standard (less strict)
  - 2 out of 11 POB had formal safety training.
- Lessons learned:
  - Strobe lights - were integral to locating survivors in the Alaska Ranger rescue, survivors often swam to others who still had functioning strobe lights.
  - Immersion suits - size/age/durability, how long should suits be considered safe? What are suit performance limits? Older Katmai suits had compromised or even broken zippers, torn seams, zipper delamination, tears etc. (*although its unclear whether this occurred before/after sinking*) Beyond visual inspections it may be prudent to have regular inflation/pressure testing annually or biannually
  - Life Rafts - issues of age/design, need to be aware of raft-entry and severe weather performance, stability concerns
    - 46 CFR 160.051 - Coastal Service
    - 46 CFR 160.151 – SOLAS standard for oceans service, updated in 1998, larger ballast pockets, boarding ramps etc.
  - Safety Training – 9 out of 11 trained workers got into rafts, additionally, 2 of the trained workers led survival efforts and helped others survive.
- Recommendations:
  - Work to reduce search-rescue distances
  - Promote ACSA type programs for remote fisheries
  - Strobe-type lights on immersion suits
  - Fit/maintain/test immersion suits, research suit lifespan
  - Require 46 CFR 160.151 liferaft standards for oceans service
  - Safety training for all fishermen every 3-5 years.
- Comments: Robin suggested vessels keep a better inventory of suits on the boats, making sure to track sizing, models, years, tests, inspections, etc.

❖ **Recommended updates to ACSA Guidance, Troy Rentz:**

- *Distributed summary of modifications and ACSA Guides with track changes for stakeholders and consultants to review.*
- Page by page review of document:
  - Title - removed 'implementation', updated revision date
  - Table of Contents will be adjusted as needed

- Page 1 & 2 - new points of contact added, removed name from Dutch Harbor listing because of frequent command changes. *Command center phone numbers to be added.*
- Page 9, deleted paragraph regarding compliance date of 1 Jan 2008.
- Page 10 – Discussed comment regarding wording: “...a fish processing vessel converted for use” needs changed to “a ‘vessel’ converted for use...” Commander Woodley submitted new wording to clarify second paragraph. *“A vessel built or converted for use as a fish processing vessel after January 1, 2006, which produces one or more of the products identified as “Beyond Minimal Processing” in Annex 1, must be classed and loadlined as required by existing laws and regulations. On a case by case basis, an owner may apply for an exemption from class and loadline in accordance with 46 CFR 28.60 and 46 USC 5108 (a)(1). Exemptions are not automatic. Vessel owners requesting an exemption may not produce those products until such time as the exemption has been granted (if granted at all) and the vessel is in full compliance with the conditions of the exemption”.*
- Page 13 - *Section A - Administration*: divided administrative tasks according to categories (USCG Districts 13 and 17, Sectors Seattle and Sector Anchorage, ACSA Examination Personnel, 3<sup>rd</sup> Party Organizations, ACSA Vessel Owners and Operators), minor changes in description wording as fit, added role of ACSA vessel owners/operators.
- Page 15 - added paragraph detailing pre-inspection preparations, clarified the four ACSA inspection types (as previously printed in the ACSA newsletter). Discussed “Certificate of Compliance” (COC) - Dan Hardin clarified the COC requirement will be satisfied by F/V Safety exams - 3rd party COCs will be accepted and exemption letters will be amended to reflect if a 3rd party was used.
- Page 22, *Section C - Ground Tackle*: changed reference to ABS Rules for building and classing steel vessels under 90 meters Part 2 Chapter 2. Added Operational test of windlass to inspection checklist.
- Page 24, new paragraph: *Installed anchoring systems that do not meet the ABS standard are acceptable (grandfathered) until they no longer function or have deteriorated beyond the limit. When a grandfathered anchoring system is replaced rather than just repaired, the new anchoring system must meet ABS standards.*
- Page 36 - *Section H - Life Saving*: proposal to incorporate life raft approval standard 160.151 (SOLAS liferafts). *Already found on most ACSA vessels, these rafts provide greater protection and survivability when vessels operate in harsh and cold conditions. This is due to superior design, construction and testing. Implementation Date - January 1, 2011*
- Page 54 - *Annex 5*: added a sample Exemption Letter which lists expiration and examination due dates directly on the letter, and references new document name

❖ **Feedback from stakeholders for additional modification/clarification:**

- Discussed possible clarification of terminology to create consistency dry-dock exam v. hull exam; 2 months v. 60 days.  
All ACSA guidance will be updated for consistency in terms.
- Page 19 v Page 20: Sump Pump requirement wording:  
Fix inconsistency between page 19 & 20. Pg 20 was changed last year. Pg 19, checklist was not. Pg. 19 will be updated to align with page 20.
- Embarkation Ladders discussed - length requirement clarification. Some ladders are for outside parties (CG/pilots) to board others are for embarking liferafts from the vessel. In some cases one ladder can satisfy both. New wording will be submitted to clarify ladder types & requirements and how a single ladder could satisfy both requirements in some cases.

❖ **Amendment 80 Vessel replacement provisions, CDR Chris Woodley:**

- USCG took a formal role in discussions of Amendment 80 vessel replacement provisions. Presented a formal write up of safety issues, and gave presentations to the North Pacific

Fisheries Management Council, bringing safety component to the forefront of fisheries management policy decision making.

- If the Amendment 80 vessel replacement provisions are passed in current form, vessels will be replaceable up to 295 feet LOA
- Replacement vessels must be classed and load-lined or be enrolled in the ACSA program to be eligible.
- A *replaced* vessel can become a *replacement* vessel if it is classed/loadlined or in ACSA.
- Commander Woodley thanked individual owners and the Groundfish Forum who were able to contribute helpful safety input and comments to the discussions.

❖ **Common discrepancies on ACSA vessel examinations**, Marty Teachout, Sector Seattle:

- *Watertight integrity of doors and hatches*- ACSA guidance states that all WTD doors and hatches must be alarmed. In lieu of alarming all WTD and hatches if the vessel has a maintenance log of all watertight doors and hatches and conducts periodic inspections and maintenance to ensure doors and hatches are working properly. If the correct maintenance is done throughout the year and the WTD and hatches are in good and working condition the WTD and hatches will not have to be alarmed.
  - Troy Rentz recommended the NPFVOA shipboard watertight door and hatch training for at least one person on each vessel to enhance maintenance, adjustment and test procedures onboard. The course may be held at Olympic College in Bremerton or onboard your vessel. More information:  
<http://www.npfvoa.org/pages/shipboardwatertightdoorhatch.html>
- *Engineering tests on MDE and Generators* – Operational tests can be done by a qualified servicing company with the test results sent to the local Marine Inspector, or the local CG Marine Inspector can do the machinery tests. During the vessels next Mid-Period or Renewal inspection all vessels will have to have in place a set of written test procedures for testing main diesel engines and generators. All ACSA vessels will be required to test reverse-power relays annually (for more specific questions – contact Marty or Paul)
- *Wire-runs* – All cables must be supported by metallic hangers. Existing cables are OK as long as they are in good condition. For all new installations check with the CG before installation to ensure new cables meet the standard. CG inspector (Paul) is willing to assist as necessary with the electrical systems
- Review the CG840 book and ACSA Guidance prior to your inspection, pay particular attention to engine room, fuel hose piping systems, bilge piping, overboard discharge piping, hydraulics hoses.

❖ Comments:

- 835 - Requirements vs. recommendations, everything that is “required” is in the ACSA Guide or in the fishing vessel safety regulations. Other recommendations may be made and noted as “recommendations”.
- Page 33, fuel systems, hard piping vs. fire sleeve - hard piping is recommended, considered safer - but approved hose with fire sleeve is acceptable.
- Kenny Down, Freezer Longline Coalition – suggested watertight door alarm systems don’t make much sense for smaller vessels with smaller crews who know when doors are open/closed. Instead of alarms, better maintenance logs should be the focus.
- Recommendation from ACSA Inspectors: Engage naval architects before and throughout dry-dock process for repair plans and adding or changing structural components, doing it earlier helps avoid problems coming up right before vessels are due to leave the dry-dock.

❖ **Citizenship/immigration status requirements on board U.S. fishing vessels**, Dan Hardin

- All Licensed Officers that are required by regulation must be U.S. citizens

- Unlicensed seaman includes fish processor personnel
  - 75/25 rule - 46 USC 8103(i) applicable to all vessels
  - At least 75% of unlicensed seaman (including fish processors) must be either: a U.S. citizen **or** an alien lawfully admitted to the US for permanent residence (green card).
  - The remaining 25% of unlicensed seaman (including fish processors) can be any other alien allowed to be employed under the Immigration and Nationality Act (H-2B Work Visa).
  - Waivers are available if you are unable to meet 75/25 requirement. The policy letter details the requirements necessary to get a waiver, which include a letter from the Dept. of Labor stating sufficient U.S. citizens were not available for employment, must be able to demonstrate effort to recruit U.S. workers.
- ❖ **Q & A, further discussions on recommended modifications to ACSA guidance**
- Troy Rentz recommended adopting EPIRBs with internal GPS (GPIRBs) for the ACSA standard. This would reduce response time because search and rescue responders will have specific coordinates of the emergency upon receipt of the 1<sup>st</sup> GPIRB transmission. ACSA Stakeholders widely agreed GPIRBs are valuable communications & lifesaving equipment, particularly in remote cold water areas. The recommendation was not acted upon at this meeting. There was some concern about adding another ACSA requirement but the group was open to further discussion. Troy Rentz stated he would provide further information for the group to consider.

❖ **In attendance:**

- Greg Thomas Iquique US
- Ed Miner USCG Sector Anchorage
- Danielle Wiley 17<sup>th</sup> Coast Guard District, Juneau
- Richard Thummel Alaska Leader Fisheries
- Jack Kemerer USCG Headquarters
- Brett Thompson 13<sup>th</sup> Coast Guard District, Seattle
- Bill McGill FCA
- Kevin Kiive American Seafoods Co.
- Keith Bruton O'Hara Corp.
- Tim Meintz Cascade Fishing Inc.
- Dave Hopkins Aleutian Spray Fisheries
- Paul Tramm USCG Sector Seattle
- Paul Anderson NIOSH
- Corine Seitz Ocean Peace
- David Green JMC-RET
- Scott Hansen Beauty Bay
- Lori Swanson Groundfish Forum
- Brad Clare USCG Sector Anchorage
- Alan Davis American Seafoods
- Jacob Varghis USCG Pacific Area
- Ken Lawrenson 17<sup>th</sup> Coast Guard District, Juneau
- Troy Rentz 13<sup>th</sup> Coast Guard District
- Brad King U.S. Intrepid
- Robin Kendall USCG Sector Seattle
- Kenny Down Freezer Longline Coalition
- Chris Woodley USCG Sector Seattle
- Marty Teachout USCG Sector Seattle
- Susan Robinson Fishermen's Finest
- Mark Labert USCG MSD Dutch Harbor
- Dan Hardin 13<sup>th</sup> Coast Guard District
- Robert Thomas FCA
- Phil Dang Cascade Fishing Inc.
- Pat Burns Blue North Fisheries
- Joe Oliver Cascade Fishing Inc.
- Tommy Laing Commercial Marine Service
- Sean Testa Jensen Maritime
- John Dwyer USCG Sector Seattle
- Kristian Uri Fishermen's Finest Inc.
- Mark Gleason Ocean Peace Inc.
- Brett Vielbig PLL
- Bill Dennis Clipper Seafoods