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16720/4 NMC Policy Ltr No. 9-98

From: Commanding Officer, National Maritime Center

To: Distribution

Subj: FIRE FIGHTING COURSE APPROVAL

- 1. Title 46 Code of Federal Regulations (CFR) 10.205(g) requires that all applicants for the following licenses complete a course of training in both basic and advanced fire fighting:
 - a. Master of vessels of 200 gross tons or less in ocean service;
 - b. Master or mate on vessels over 200 gross tons;
 - c. Operator of uninspected towing vessels, oceans (domestic trade);
 - d. Licenses on mobile offshore drilling units; and,
 - e. Engineer licenses.
- 2. 46 CFR 13.207, 13.307, 13. 407, and 13.507 contain additional requirements for fire fighting training for those seafarers seeking an endorsement to serve on tank vessels or tank barges.
- 3. The International Convention on Standards of Training, Certification and Watchkeeping (STCW) for Seafarers, 1978, as amended and the Seafarers' Training, Certification and Watchkeeping Code, state the international fire fighting training requirements. STCW Regulation VI/1 of the Annex to the STCW and section A-VI/1 of the STCW Code require that seafarers with designated safety or pollution prevention duties receive training in basic fire fighting. STCW Regulation VI/3 and section A-VI/3 of the STCW Code require that seafarers designated to control fire fighting operations receive advanced fire fighting training.
- 4. Individuals seeking an endorsement as the person in charge of liquid cargo transfers for tank ships or tankerman-engineer must meet the fire fighting requirements of STCW Regulation VI/1, section A-VI/1 of the STCW Code, and 46 CFR 13.121 and Table 13.121(g).
- 5. Basic and advanced fire fighting courses approved by the U.S. Coast Guard National Maritime Center must meet the relevant basic and/or advanced sections of International Maritime Organization (IMO) Resolution A.437(XI), *Training Crews in Fire Fighting*.
- 6. The IMO Basic Fire Fighting Model Course (No. 1.20) is an 18 hour course including training in the following subjects:
 - a. Theory of Fire;
 - b. Fire Prevention;

- c. Fire Detection;
- d. Fixed Fire-extinguishing Systems;
- e. Miscellaneous Fire Fighting Equipment;
- f. Shipboard Fire Fighting Organization;
- g. Fire Fighting Methods;
- h. Fire Fighting Drills; and,
- i. Review and Assessment.
- 7. The IMO Advanced Training in Fire Fighting Model Course (No. 2.03) is a 36 hour course including training in the following subjects:
 - a. Theory of Fire;
 - b. Fire Control Aboard Ships;
 - c. Ship Fire Fighting Organization;
 - d. Training Seafarers if Fire Fighting;
 - e. Inspection and Servicing of Fire Appliances and Equipment;
 - f. Fire Fighting Process Hazards;
 - g. Fire Investigation and Reporting; and,
 - h. Review and Assessment
- 8. Based upon national and international standards and requirements, the NMC will approve only four types of fire fighting courses. The courses are:
 - a. A basic fire fighting course of at least 16 hours in length, covering the learning objectives of Table A-VI/1-2 of the STCW Code and IMO Model Course No. 1.20, as well as 46 CFR Table 13.121(g);
 - b. An advanced fire fighting course of at least 32 hours in length covering the learning objectives of STCW Code Table A-VI/3;
 - c. A combined basic and advanced course of at least 40 hours in length covering the learning objectives of both 8.a and 8.b above; and,
 - d. A tank barge fire fighting course of at least 16 hours in length covering the learning objectives of 46 CFR 13.121 and Table 13.121(g).

Reductions in the time allotted to teach the IMO Model courses resulted from deletion of non essential or duplicated topics from the model courses.

9. Many of the subjects covered in classroom lectures of well designed fire fighting courses allow students to train safely during practical exercises and demonstrations of competency. A delay in conducting the practical training will require additional time for review of these safety topics and procedures at the time the field exercises are conducted. Failure to do so poses a risk of harm to the students. Consequently, the NMC will no longer approve fire fighting courses that are taught in two separate parts, with completion of the field training occurring more than 2 days after completion of the classroom portion of the course. In order to receive Coast Guard approval, the course must be taught without interruption in

accordance with the recommended IMO model course guidelines.

- 10. Schools seeking approval for fire fighting courses must submit curricula that are consistent with the IMO model courses and guidelines of the U.S. Coast Guard, with one exception. A Basic or Combined Basic and Advanced Fire Fighting Course does not need to include a practical demonstration of passing through a foam filled room without a breathing apparatus, as recommended in IMO basic fire fighting model course No. 1.20.
- 11. Classroom or fire field training hours shall not exceed nine hours per day. Training days of greater duration are not effective and fatigued students may pose a risk of harm to themselves or other students.
- 12. Schools that have currently approved fire fighting courses that do not meet the requirements of the STCW Tables, IMO model courses, and/or U.S. regulations, as appropriate, have 120 days in which to resubmit the courses to the NMC for evaluation. Schools that have currently approved fire fighting courses with field and classroom training not conducted as a single course have 120 days in which to resubmit the course schedules to the NMC for evaluation. Failure to do so will result in the loss of fire fighting course approval.
- 13. Anyone having questions may contact Mr. John Bobb of my staff at (703) 235-8457.

W. C. BENNETT By direction

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All Schools with USCG Approved Fire Fighting Courses