



16711
CG-ENG Policy Letter
No. 05-12
September 7, 2012

From: J. Mauger, CAPT
COMDT (CG-ENG)

A handwritten signature in blue ink, appearing to read "J. Mauger", with a large flourish extending to the right.

To: Distribution

Subj: POLICY ON THE IMPLEMENTATION OF ADDITIONAL PERSONNEL SAFETY
REQUIREMENTS FOR CARBON DIOXIDE FIRE SUPPRESSION SYSTEMS.

Ref: (a) "Carbon Dioxide Fire Suppression Systems on Commercial Vessels", 77 FR 33860,
Thursday June 7, 2012, Final Rule.

1. Purpose. This policy letter clarifies the application of the new requirements for lock-out valves and odorizing units contained in ref. (a).
2. Directives affected. None.
3. Background. Ref. (a) requires lock-out valves on all carbon dioxide fire extinguishing systems protecting spaces over 6,000 cubic feet in volume, that are installed or altered after July 9, 2013. In addition, all systems that are installed or altered after July 9, 2013, must be fitted with an approved wintergreen odorizing unit.
4. Discussion.
 - a. New regulatory requirements are often linked to the contract date or keel-laying date of the vessel. However, in this case, the application date is linked to the date of system installation, since there may be instances where an extinguishing system is installed or altered long after the keel-laying date, or where a system on an existing vessel becomes unserviceable and must be replaced.
 - b. To facilitate orderly implementation of the requirements and minimize potential impacts on system installations or alterations contracted for or procured prior to the publication of the final rule, new systems or alterations that are documented as being contracted for or procured prior to June 7, 2012 need not comply with the new requirements irrespective of the date of installation or alteration.
 - c. The extent of alterations to existing systems that require the addition of lock-out valves and odorizing units is explained in the regulations as any modifications or refurbishment beyond the maintenance required by the manufacturer's design, installation, operation and maintenance manual. As additional clarification, the Coast Guard considers this to mean any material changes to the system such as the addition of discharge piping, nozzles, valves,

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components, or additional agent cylinders. Normal system repairs which are done as the result of periodic maintenance and testing, such as tightening of fittings or piping hangers, replacement in kind of pressure switches, flexible connectors, or cylinders with expired hydrostatic test dates are not considered alterations requiring the installation of the new equipment.

5. Disclaimer. While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements, this policy is not a substitute for applicable legal requirements nor is it a regulation itself. Thus, it is not intended to nor does it impose legally binding requirements on any party outside the Coast Guard.

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