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CG-ENG Policy Letter
No. 01-19
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From: B. J. Hawkins
COMDT (CG-ENG), Acting

To: Distribution

Subj: EQUIVALENCY DETERMINATION – FIRE PUMPS FOR SUBCHAPTER C AND
SUBCHAPTER M TOWING VESSELS

Ref: (a) Title 46 Code of Federal Regulations (CFR) Part 27
(b) Title 46 Code of Federal Regulations (CFR) Part 142
(c) “Fire-Suppression Systems and Voyage Planning for Towing Vessels” interim rule,
68 FR 22604 April 29, 2003
(d) “Fire-Suppression Systems and Voyage Planning for Towing Vessels” final rule, 69
FR 34064, June 18, 2004
(e) “Inspection of Towing Vessels” final rule 81 FR 40003, June 20, 2016

1. Purpose. This policy letter provides guidance on the acceptance of fixed fire pump size requirements for towing vessels 65 ft or less to provide a level of safety that is equivalent to the requirements of reference (a) and (b), uninspected and inspected towing vessels, respectively.
2. Background.
 - a. The Coast Guard has statutory authority under Title 46, U.S. Code Section 3306 (a) and (b) to prescribe regulations for the design, construction, alteration, repair, and operation of fire-fighting equipment.
 - b. Under 46 CFR 24.15-1 and 46 CFR 136.115, the Coast Guard has the authority to approve any arrangement that provides a level of safety equivalent to that established by any specific provision of 46 CFR Subchapters C and M, respectively.
 - c. On April 29, 2003, the Coast Guard published reference (c), which updated the fire pump requirements for towing vessels, 46 CFR 27.301. After considering comments on that interim rule, on June 18, 2004, it published reference (d) which further improved fire pump requirements in 46 CFR 27.301. On June 20, 2016, the Coast Guard published reference (e), which applied the same fire pump requirements from Subchapter C to inspected towing vessels under the new Subchapter M, 46 CFR 142.325.
3. Discussion. When developing references (c) and (d), the Coast Guard assumed smaller vessels would utilize portable fire pumps, while larger vessels would utilize fixed fire pumps;

therefore, vessel size was not associated with fire pump requirements. This assumption imposed a larger burden on smaller vessels that opted to install fixed fire pumps. Generally, the fixed pump is required to have a higher capacity to accommodate the greater hydraulic losses expected from the extensive fire main systems used in larger vessels. In small vessels, however, the hydraulic losses of the smaller fire main systems are negligible, and the fixed fire pump need be of no higher capacity than the portable pump. Thus, in small vessels, fixed and portable pumps of similar capacity will provide similar fire streams affording an equivalent level of safety. Accordingly, for towing vessels 65 ft or less, the Coast Guard has determined a fixed pump that meets the portable pump capacity and pressure requirements meets an equivalent level of performance to the requirements in references (a) and (b).

4. Action.
 - a. Subchapter C: For towing vessels 65 ft or less subject to 46 CFR 27.301, vessels may use a fixed pump that meets the performance requirements of 46 CFR 27.301(e)(1), instead of 46 CFR 27.301(a)(1). These towing vessels must also meet the requirements in 46 CFR 27.301(a)(2), (b)-(d).
 - b. Subchapter M: For towing vessels 65 ft or less subject to 46 CFR 142.325, vessels may use a fixed pump that meets the performance requirements of 46 CFR 142.325(e)(1), instead of 46 CFR 142.325(a)(1). These towing vessels must also meet the requirements in 46 CFR 142.325 (a)(2), (b)-(d).
5. Disclaimer. This policy is neither a substitute for applicable legal requirements, nor is it itself a rule. It is neither intended to nor does it impose legally-binding requirements on any party. It represents the Coast Guard's current position on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. Alternative approaches for complying with these requirements may be considered. Information should be made available to Commandant (CG-ENG-4) to show that the approach satisfies the requirements of the applicable statutes and regulations.
6. Questions. Questions or concerns regarding this policy may be directed to Commandant (CG-ENG-4) at typeapproval@uscg.mil.

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