

U.S. Department of
Homeland Security

United States
Coast Guard



Commanding Officer
United States Coast Guard
Marine Safety Center

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February 2, 2011

Bureau Veritas USA, Marine Division
Attn: Mr. Colin Adams

[REDACTED]
Port Everglades, FL 33316

Subj: CHIHUAHUA STAR, IMO No. 8814263
175m x 27m x 9.85m Passenger / Vehicle Ferry (SOLAS)
1150 Persons
Initial Control Verification Plan Review

- Ref:
- (a) Baja Ferries Dwg "Arreglo General," 1 sheet, dated October 2010
 - (b) Baja Ferries Dwg "Proteccion Estructural Contra incendio (Structural Fire Protection)," 2 sheets, dated November 2010
 - (c) Baja Ferries Dwg "Medios de Escape (Means of Escape)," 2 sheets, dated November 2010
 - (d) Baja Ferries Dwg "Plan de Control de Incendio (Fire Control Plan)," 2 sheets, dated November 2010
 - (e) Baja Ferries Dwg "Dispositivos de Salvamento (Life Saving Appliances)," 1 sheet, dated November 2010
 - (f) Baja Ferries Dwg "Plano de Seguridad (Fire Fighting and Safety Plan)," 1 sheet, dated December 2010

Dear Mr. Adams:

We reviewed references (a) through (f), submitted with your letter dated January 4, 2011, for compliance with the provisions of SOLAS 74 as amended, including all of the Retroactive Fire Safety Amendments (RFSAs). Our review focused only on the specific arrangements, means of escape, and structural fire protection of the vessel relative to both an Initial Control Verification Exam (ICVE), and RFA exam in accordance with the policies in Navigation and Vessel Inspection Circular (NVIC) 3-08, "Control Verification Examinations (CVEs) of Foreign Passenger Vessels" and NVIC 4-95, "Fire Safety Standards for Foreign Passenger Vessels Constructed before 1 October 1994." Unless otherwise indicated, all regulatory citations in this letter refer to SOLAS 74, as amended through the 1992 Amendments. References (a) through (f) are being held in abeyance pending resolution of the following comments:

1. Please be aware that we were unable to verify compliance with all aspects of the currently applicable RFA requirements during plan review. Accordingly, during the Coast Guard inspection of the vessel, systems such as emergency lighting, alarm and public address, automatic fire doors, and fire detection and suppression will be examined closely for compliance with the RFA requirements. To this end, please have flag approved ventilation details on hand and be prepared to demonstrate compliance with all applicable RFA items described in Regulation II-2/41-2 at the time of the examination.

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2. We note several spaces in reference (a) have either not been categorized, have not been labeled, or have been incorrectly categorized with respect to the structural fire protection requirements of Regulation II-2/26. Please address the nature and use of the following spaces, revising the appropriate plans accordingly:

- a. Deck 5, fr 32-34, centerline. This unlabeled category (13) space appears to be storage for pool chemicals.
- b. Deck 5, fr 43-45, stbd side. The nature of the unlabeled category (2) space in this location is not clear.
- c. Deck 5, fr 37-61, centerline. This corridor is classified as a category (9) space. It appears the appropriate designation for this space is category (3).
- d. Deck 5, fr 61-63, centerline. This athwartships corridor is classified as a category (9) space. It appears the appropriate designation for this space is category (3).
- e. Deck 5, fr 92-95, port side. It appears this uncategorized and unlabeled space adjacent to the stairway enclosure should be classified as a category (3) corridor.
- f. Deck 5, fr 147-153, centerline. If the "Recepcion" office serves as a back office to the adjacent category (2) stairway enclosure, the correct designation of this space per Regulation II-2/41-2.4.6 is category (6).
- g. Deck 6, fr 63-95, centerline. It appears this uncategorized and unlabeled space should be classified as a category (3) corridor.
- h. Deck 6, fr 80-91, stbd of center. It appears the uncategorized "Salon" should be classified, and protected, as a dual category (4) and (8) space.
- i. Deck 6, fr 147-154, centerline. It appears this unlabeled space should be classified as a category (3) corridor vice the current category (8) designation.
- j. Deck 6, fr 154-158, stbd of center. This uncategorized and unlabeled space appears to be some type of store room. Please clarify this space.
- k. Deck 7, fr 119-123, stbd side. As this store room is larger than 4m², it should be classified as a category (13) space vice the current category (7) designation.
- l. Deck 8, fr 167-171, port of center. The nature of the unlabeled category (1) space in this location is not clear.

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3. We note several locations in reference (a) for which structural fire protection boundary ratings do not appear to be in accordance with the requirements of Regulation II-2/26. Please address this issue relative to the following:

- a. Deck 6, fr 179, port and stbd. As the bulkhead boundaries separating both the category (3) corridors and category (7) cabins from the adjacent category (4) open deck platforms and stairs is in the “new cabin” area, these ratings should be A-60 vice the A-0 rating indicated.
- b. Deck 6, frames 119-147, port and stbd. The deck boundary between the category (7) accommodation spaces and the category (4) areas above is shown intermittently as A-0 and A-15. All portions of the deck boundary in this “existing cabin” area should be A-15.
- c. Deck 6, frames 155-157, port and stbd. The deck boundary between the category (7) accommodation spaces and the category (4) areas above is shown intermittently as A-15 and A-60. All portions of the deck boundary in this “new cabin” area should be A-60.

4. Regulation II-2/35.1.1 requires draft stops to be fitted in air spaces enclosed behind ceilings, paneling and linings such that the enclosed air spaces do not exceed 14 meters (m) in any direction. It appears that the embarkation area adjacent to the port marine evacuation slide on Deck 5, frames 33-60, requires the fitting of a draft stop similar to that fitted on the starboard side of the vessel in this location. Please address this issue.

5. We are concerned that the vessel’s special category space boundary ratings are not in compliance with Regulation II-2/37.1.2, as required by Regulation 41-2.6.4. Please address compliance with this regulation, including details of separation between Main Horizontal Fire Zone 1 (Decks 2 and 3) and Main Horizontal Fire Zone 2 (Deck 4).

6. It appears that several spaces throughout the vessel may inappropriately retain direct access to category (2) stairway enclosures. Regulation II-2/29.2 forbids direct access to stairway enclosures from enclosed spaces containing combustibles in which a fire is likely to originate. Please address this issue relative to the following spaces, revising their arrangements as appropriate:

- a. Deck 5, fr 147-153, centerline. “Recepcion” office.
- b. Deck 5, fr 101-103, stbd side. Unlabeled space (Please note it is also not clear where the lift access is in this location).
- c. Deck 6, fr 123-127, port side. “est c.i.” space.

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7. In accordance with Regulation II-2/28.1.2, there shall be at least two means of escape from any restricted group of spaces with at least one giving access to a stairway. We note several spaces provided with only one apparent means of escape, each relying on an escape path leading through adjacent category (8) accommodation spaces of greater fire risk. Please address the escape arrangements in the following spaces:

- a. Deck 4, fr 80-91, stbd of center. Salon.
- b. Deck 4, fr 149-158, stbd of center. Estancia Infantil.

8. Please note that all fire doors in stairway enclosures, main vertical zone bulkheads, and galley boundaries, which are normally kept open, must be capable of release from a central control station and from a position at the door per Regulation II-2/41-2.6.5. In addition, all hinged fire doors in stairway enclosures, main vertical zone bulkheads, and galley boundaries, which are normally kept open, must be self closing per Regulation II-2/41-2.4.1 and all fire doors (including normally closed doors) in stairway enclosures, main vertical zone bulkheads, and galley boundaries must have closure indicator lights located in a continuously manned central control station as per Regulation II-2/41-2.4.2. Compliance with these regulations will be verified at the time of the vessel's examination.

9. Please confirm that the fixed fire suppression (sprinkler) system, other than the manual drencher system protecting the special category spaces, meets Regulation II-2/12 for automatic activation and initiation of alarm.

Should you have any questions about this review, please contact the project officer, Mr. Tom Waters, at the phone number listed above.

Sincerely,



Lieutenant Commander, U.S. Coast Guard
Chief, Major Vessel Branch
By direction

Copy: Commander, Coast Guard Sector San Juan, Prevention Department
Commandant, U.S. Coast Guard (CG-5432)