

**U.S. Department of
Homeland Security**

**United States
Coast Guard**



Commanding Officer
United States Coast Guard
Marine Safety Center

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16710/P019668/jdb
Serial: E1-1800367
February 9, 2018

Filtersafe Ltd.
Attn: Eta Dagan
HaElla Street, Tefen Industrial Park
P.O. Box 23, 2495900, Israel
Etai@filtersafe.net

Subj: INDEPENDENT ASSESSMENT OF THE FILTERSAFE TURBO AND SUPER TURBO FILTERS

Ref: (a) InBallast Final report, "Testing and comparison of the Filtersafe Standard, Turbo, and Super Turbo configurations," 23 pages, dated September 25, 2017
(b) DHI Doc. No. 11820938, "Filter performance test," 39 pages, dated September 8, 2017
(c) "USCG FS comment aaba23012018_BG," 7 pages, dated January 23, 2018

Dear Mr. Dagan:

We reviewed references (a) and (b), submitted by your letter dated December 11, 2017 (MSC Document No. 1723280). In response to our request for clarifying information, you submitted reference (c) via email dated January 23, 2018 (MSC Document No. 1810557). In your letter, you request acceptance of an engineering analysis of the Filtersafe Turbo and Super Turbo filters, which demonstrates that the removal rate of both configurations meets or exceeds that of the Standard version when used in the context of ballast water management system (BWMS) type approval testing. The intent of this analysis is to validate that the three filters have similar performance characteristics and may be used interchangeably after completing biological efficacy testing with only the Standard version.

We concur that your engineering analysis supports a conclusion that the removal rate of the Filtersafe Turbo and Super Turbo filters appears comparable to that of the Standard version when used in the context of BWMS type approval testing. BWMS manufacturers seeking approval to use the three Filtersafe filter options interchangeably should refer to this letter, and references (a) through (c), when requesting alternates as equivalent under 46 CFR 162.060-10(b)(1) or when requesting changes to an approved system under 46 CFR 162.060-16. Please be advised, we review each BWMS application, request for equivalence, or change request we receive on a case-by-case basis and will determine if any additional issues specific to the design and construction of the BWMS need to be validated before approving the request.

This letter does not constitute blanket approval to substitute all three filters interchangeably on a type approved BWMS. Filter use must be in accordance with the Operation, Management, and

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Safety Manual referenced in the type approval certificate. Changes to an existing type approval certificate, such as the use of additional filters, must be made in accordance with 46 CFR 162.060-16.

Please contact Lieutenant Jacob Baldassini at (202) 795-6736 with questions concerning this letter.

Sincerely,

C. J. ROBUCK
Lieutenant Commander, U. S. Coast Guard
Chief, Engineering Division
By direction