ABS Consulting

RISK CONSULTING DIVISION / MARINE SERVICES

GUIDE FOR ALTERNATE CERTIFICATION OF CONTINUOUSLY MOORED, SELF-PROPELLED, RIVERBOAT GAMING VESSELS IN THE STATE OF INDIANA

(Gaming Boats Operating Dockside and Not Subject To Routine Regulatory Inspections by the U.S. Coast Guard)

7 June 2007

ABSG CONSULTING INC.

16855 Northchase Drive, Houston, TX 77060-6008
Telephone: (281) 673-2769 / Fax: (281) 673-2960
e-mail: rgoss@absconsulting.com

Guide for Alternate Certification of Continuously Moored, Self-Propelled, Dockside, Riverboat Gaming Vessels In the State of Indiana
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NOTICE

ABS CONSULTING has been selected to represent the interests of the Indiana Gaming Commission (IGC) with regard to inspections of Alternate Certification Riverboat Gaming Vessels operating dockside in the state of Indiana. At the request of the Indiana Gaming Commission, fees and expenses for efforts of ABS Consulting that are associated with project meetings, surveys, inspections, engineering reviews, building code plan reviews, research, travel, and report preparation, as well as any other vessel specific certification efforts that may be requested by the Indiana Gaming Commission, shall be invoiced by and paid directly to ABS Consulting, by the Casino Owner/Operator.

While this guide is intended to assist in identifying requirements for receipt of an IGC Certificate of Compliance, it should not be used as a substitute for the responsibility of owners, operators and/or their civil and naval architects to assure that the construction and operation of any specific Alternate Certification Riverboat Gaming Vessel is fully compliant with all current and applicable Indiana state laws and Indiana Gaming Commission rules, as well as current and applicable USCG regulations, the International Building Codes and/or other recognized standards/codes acceptable to ABS Consulting, and/or the Indiana Gaming Commission, so as to afford gaming patrons at least an equivalent level of safety, while dockside, as existing COI Vessels operating as dockside riverboat casinos in Indiana.

Nothing contained in this guide shall be deemed to relieve any designer, builder, owner, manufacturer, seller, supplier, repairer, operator or other entity of any warranty, expressed or implied. Neither ABS Consulting, nor any of the individuals, or their companies, assisting in the preparation of this guide shall be responsible for any inaccuracy or omission, whether real or perceived.

The words “shall” and “should”, as used in this document, are not synonymous. The word “shall", directs adherence to a cited and/or known and accepted criteria. The word “should” indicates a recommendation for action with regard to a cited document and/or known and accepted criteria.

SECTION 1

GENERAL OVERVIEW OF ALTERNATE CERTIFICATION FOR RIVERBOAT GAMING VESSELS OPERATING DOCKSIDE IN THE STATE OF INDIANA

Since ABS Consulting published its first gaming vessel guide in March of 1996, permanently and continuously moored floating casinos in several states have evolved from relatively basic individual barges and boats moored at docks along navigable waterways, to elaborate floating casinos that are nearly integral with the landside facilities. This guide has been developed with the knowledge gained from many years of experience working with casino owners, shipyards, civil and naval architects, state commissions, state inspection authorities, U.S. Coast Guard, American Bureau of Shipping and other related interests, and is specifically intended for use by the owners of all gaming boats desiring to operate under Indiana Gaming Commission standards for Alternate Certification. In accordance with Indiana Code 4-33-4-1(a)(9), 4-33-6-6(a), and 4-33-2-17, basic design standards stated herein have been adopted by the Indiana Gaming Commission for all Alternate Certification Riverboat Gaming Vessels.

All newly constructed Alternate Certification Riverboat Gaming Vessels are subject to vessel specific plan reviews by ABS Consulting to assure that hull construction, piping and electrical installations are in accordance with prudent marine practice for vessels operating on Inland or Great Lakes waters with consideration given to each unique dock site location, as well as physical inspections during construction for verification of fabrication by ABS Consulting. Certification is subject to final review and approval by the Indiana Gaming Commission. Alternate Certification Riverboat Gaming Vessels are not passenger vessels, as defined by applicable federal laws. However, their structural strength and stability, as well as installations of machinery and equipment associated with navigation, electrical, firefighting and life safety systems, when operating as dockside gaming vessels shall provide a degree of safety for the gaming patrons that is at least equivalent to the safety minimums set forth in 46 CFR Parts 70 to 199, as specifically applicable Subchapters H, J, and S, as those minimums have been applied to the Inspected Vessels presently operating as dockside riverboat casinos in Indiana. Assuming sufficient site specific information is provided considerations may be given to specific berthing locations and/or unique environmental conditions in which a vessel will operate.

For all newly constructed Alternate Certification vessels it should be understood that installations of machinery, as well as required equipment associated with navigation, electrical, firefighting and life safety systems, must be capable of operating independently of landside services. Since no gaming patrons may be lawfully conveyed on new Alternate Certification boats, out of zone refuge will not be required. However suitable egress to landside shall be afforded in accordance with applicable rules of the International Building Code. Superstructures on Alternate Certification Riverboat Gaming Vessels that meet strength requirements for applicable underway operations on Inland or Great Lakes waters (as appropriate for each vessel's Applicable Marine Environment), may otherwise be designed and constructed in accordance with the current International Building Codes as adopted by the State of Indiana, so as to provide at least an equivalent level of patron safety while dockside to that found on existing Inspected Vessels operating as dockside riverboat casinos in Indiana.

After receiving the initial IGC Certificate of Compliance, an Alternate Certification Riverboat Gaming Vessel in the State of Indiana is subject to on-going marine compliance/condition surveys and International Building Code inspections by ABS Consulting on behalf of the Indiana Gaming Commission. At least Annual and Semi-Annual Surveys will be accomplished.

Federal laws require that most motor vessels over 300 gross tons (admeasured tonnage) possess a valid U.S. Coast Guard Certificate of Inspection (COI). Alternate Certification dockside gaming vessels are not intended to ever carry passengers/gaming patrons while underway and in line with the intended dockside gaming operations, have been determined by the USCG to be out of navigation and substantially landside structures – thus, the USCG has

declined to issue Certificates of Inspection to these new vessels. Because Indiana law requires all Riverboat Gaming Vessels to be self-propelled, it shall be understood that to intentionally get underway, an Alternate Certification dockside Riverboat Gaming Vessel must have no persons other than crewmembers aboard, be manned in accordance with appropriate USCG requirements and comply with all navigation rules for the specific voyage, including required certificates and current navigation publications, as well as navigation equipment required for the class of vessel and area of intended operation.

Dock trials and simulated underway operations (as reasonable under the specific circumstances) shall be required for all vessels being newly built for and/or being brought into the Alternate Certification program. Such vessels shall demonstrate satisfactory operation of all on-board marine systems, communication and navigation equipment, as well as life safety systems and associated equipment, without connection to landside services. During all subsequent annual and semi-annual inspections, dock trials of systems will also be required.

Manning of Alternate Certification Riverboat Gaming Vessels shall be equivalent to the minimums traditionally applied by the U.S. Coast Guard to COI Vessels that are presently operating as dockside riverboat casinos in Indiana. (It has been noted that the USCG has granted numerous manning variances to such COI Vessels.) Reference to manning levels is found in 46 CFR 15 Subpart G - Computations: "The OCMI will determine the specific manning levels for vessels required to have certificates of inspection by part B of subtitle II of title 46 U.S.C. The masters or individuals in command of all vessels, whether required to be inspected under 46 U.S.C. 3301 or not, are responsible for properly manning vessels in accordance with the applicable laws, regulations, and international conventions."

Since it is likely that no sea time will accrue for USCG licensed marine personnel on dockside Alternate Certification Riverboat Gaming Vessels, it may become necessary for vessel owners to employ unlicensed personnel for such operations. If so, all such personnel shall have documented evidence on file at the casino to show that they have received appropriate formal training relative to their billeted duties before they may be permitted to assume any marine crew function aboard the vessel, the same to include, but not be limited to, marine fire fighting, first aid, CPR, man overboard and general seamanship. The senior engineering personnel, if not licensed by the USCG, must have an appropriate landside stationary engineering license issued/accepted by the State of Indiana in addition to required marine training. Appropriate recurrent training will be required. Manning levels will be reviewed on a case-by-case basis prior to issuance of the Certificate of Compliance. All qualified marine personnel, shall be present and able to take part in dock trials and emergency drills, including those conducted at times of annual and semi-annual inspections.

Assuming satisfactory findings, following ABS Consulting's annual and semi-annual surveys, Certificates of Compliance will be issued, or renewed, to confirm that a vessel is apparently being maintained and operated in a manner that is consistent with a level of patron safety considered at least equivalent to that on existing COI Vessels operating as dockside riverboat casinos in Indiana.

Existing COI Vessels operating as dockside riverboat casinos in Indiana will be accepted as-is into the Alternate Certification program, subject to satisfactory completion of USCG procedures for becoming Permanently Moored Vessels (ref. Marine Safety Manual, Volume II, Section B, Chapter 4) and satisfactory inspection by ABS Consulting, to confirm appropriate safety standards and establish local oversight jurisdiction on behalf of the Indiana Gaming Commission. It should be understood that upon surrendering the USCG COI, rules and regulations of the Occupational Health and Safety Administration (OSHA) will apply to the vessel and its crew, including casino personnel.

SECTION 2

DEFINITIONS/ORGANIZATIONS

ABS RULES: For purposes of this Guide, shall include, *ABS Rules for "Building and Classing Steel Vessels for Service on Rivers and Intra-Coastal Waterways*, and *ABS Rules for Building or Classing Steel Vessels (2007)*, including parts 1-5, as applicable for Great Lakes service.

ABSG CONSULTING INC.
(d/b/a/ ABS CONSULTING): A tax paying wholly owned subsidiary of the AMERICAN BUREAU OF SHIPPING, providing a myriad of marine and non-marine engineering, inspection and consulting services, to federal and state government interests, including the U.S. Coast Guard, as well as to many other marine and industrial customers, including engineering and inspection services to various state gaming commissions for floating casinos since 1991.

ALTERNATE CERTIFICATION RIVERBOAT GAMING VESSEL: A self-propelled motor vessel which: (1) is or shall be used to conduct gambling operations by an Indiana riverboat licensee; (2) does not possess a valid Certificate of Inspection from the USCG; and (3) is accepted by IGC into the program.

AMERICAN BUREAU OF SHIPPING (ABS): With roots dating back to 1862, a non-tax paying organization chartered by the federal government to act as the United States maritime classification society establishing rules for marine construction and on its behalf in statutory matters. Authorized by the Coast Guard to ensure compliance with load line regulations and establish other related safety factors.

AMERICAN INSTITUTE OF STEEL CONSTRUCTION (AISC)

AMERICAN NATIONAL STANDARDS INSTITUTE (ANSI)

AMERICAN WELDING SOCIETY (AWS)

APPLICABLE MARINE ENVIRONMENT: The location at which an Alternate Certification Riverboat Gaming Vessel is or will be moored for dockside operations, including the body of water (or portion thereof) on which the vessel could conceivably be forced to navigate if freed from its moorings, and including the weather and other environmental conditions that can reasonably be anticipated to exist at that location.

COI VESSEL: A vessel that possesses a valid Certificate of Inspection from the United States Coast Guard.

DAMAGE STABILITY: The ability of a vessel to right itself from an external force with the assumption that a vessel's watertight integrity has been compromised.

DEADWEIGHT: The "deadweight" of a vessel is its total weight when floating at the load waterline, minus its "lightship weight". Lightship weight includes the vessel's structure, machinery, permanent outfit, etc.

HULL: Main body of a vessel providing flotation.

INTACT STABILITY: The ability of the vessel to right itself from an external force with the assumption that watertight integrity of the vessel remains intact.

INST. OF ELECTRICAL AND ELECTRONIC ENGINEERS (IEEE)

INTERNATIONAL BUILDING CODES (IBC): As used in this document, refers to the current suite of International Building Codes which consist of more than 20 different code standards including, but not limited to structural, plumbing, electrical, mechanical and life safety codes as adopted by the State of Indiana. It should be noted that these are the same codes to which landside structures adjacent to the dockside Riverboat Gaming Vessels will be certified.

LONGITUDINAL STRENGTH: The structural ability of the hull girder to carry the imposed load when the hull girder is supported by waterborne buoyancy forces.

MAIN DECK: Usually considered to be the principal continuous structural deck of a vessel's hull that extends between the forward and after ends.

MOTOR VESSEL: Any vessel more than 65' in length which is propelled by machinery other than steam. (Ref. 46 CFR 70.10-1)

NATIONAL FIRE PROTECTION ASSOCIATION (NFPA): A professional organization that sets standards for fire fighting equipment and standards for fire prevention. Some of their standards are included in Coast Guard regulations by reference such as those for a National Electrical Code and for pleasure and commercial motor craft

NAVIGATION AND VESSEL INSPECTION CIRCULARS (NVIC): Informational material published by the USCG.

SUPERSTRUCTURE: Generally speaking it is a structure that:
1. is installed on;
2. is permanently connected to; and
3. extends above the Main Deck of a marine hull.

UNDOCUMENTED VESSEL: Any vessel which is not required to, and does not have a marine document issued by the USCG. (46 CFR 188.10-75)

U.S. COAST GUARD (USCG): The Federal agency charged with enforcement of many laws and regulations concerning ships and seagoing operations. Information and inspection services are provided either from headquarters in Washington or from several regional offices around the country.

WATERTIGHT: A structure and/or closure capable of withstanding the pressure created by the head of water to which it may reasonably be subjected.

WEATHERTIGHT: A structure and/or closure that will exclude rain and/or blowing residual water, snow, sleet, and hail, but is not intended to withstand any significant head pressure.

SECTION 3

GENERAL REQUIREMENTS FOR CERTIFICATION

A. Designated Certification Agency

ABS Consulting is the Designated Certification Agency assigned by the Indiana Gaming Commission to review the design specifications and inspect construction of new Alternate Certification Riverboat Gaming Vessels, as well as survey and/or inspect existing dockside COI Vessels opting for Alternate Certification, for compliance with applicable Indiana laws and recognized codes and/or prudent practice for marine structures, and/or International Building Codes (IBC), as applicable. Indiana uses the 1997 Uniform Plumbing Code and NFPA 70 (2005 edition) as the Electrical Code, both with amendments.

B. Certification Process (New Vessels)

The ABS Consulting alternate certification process begins with reviewing vessel plans and specifications to applicable ABS Rules in consideration of applicable 46 CFR Subchapters for structure of the hull and superstructure, along with International Building Codes where appropriate, and continues with on-site verification that fabrication of the overall vessel is in accordance with the approved drawings and specifications. On-site inspections continue through completion of the facility to confirm compliance of the combined hull structures, vessel systems, superstructures and life safety systems to codes adopted by the State of Indiana, and/or applicable federal regulatory requirements and/or recognized marine codes.

1. Actual construction of Alternate Certification dockside gaming vessels should not be initiated until all plans and specifications for hull and superstructure have been approved by ABS Consulting. Should an owner elect to initiate construction prior to receiving the necessary ABS Consulting approvals, construction will still be monitored by ABS Consulting surveyors for accordance with the unapproved drawings and specifications.

However, it shall be clearly understood that if drawings and specifications require changes in already fabricated sections to meet applicable rules and standards, appropriate changes to the vessel's structure, arrangement and outfit will be required to obtain Alternate Certification. Completion of all such required changes must be verified by, and accomplished to the satisfaction of, ABS Consulting surveyors and the Indiana Gaming Commission.

2. A Certificate of Compliance is required from ABS Consulting, to verify that the specific hull, machinery, superstructure and outfit of the Alternate Certification Riverboat Gaming Vessel have been reviewed, inspected and found to provide at least equivalent levels of patron safety while dockside, to those which currently exist on COI Vessels operating as dockside riverboat casinos in the State of Indiana.

3. Plans and specifications for landside structures through which gaming patrons must exit shall be reviewed and approved by the appropriate local jurisdiction and inspected for compliance with International Building Codes as interpreted by the appropriate State Certified Building Code Inspector(s) and/or rules of the Indiana Fire Prevention and Building Safety Commission ("FPBSC"), as interpreted by the Building Law Compliance Officer and/or the FPBSC, who shall be responsible for compliance of land-based structures.

    a) In order to assure that there will be no obstruction to egress for gaming patrons from the casino, prior to issuing a vessel's Certificate of Compliance, ABS Consulting shall verify that those portions of land-based structures through which gaming patrons must exit are complete, and have a Certificate of Occupancy issued by the local jurisdiction.

4. Pursuant to Indiana Code, all dockside riverboat gaming vessels in the State of Indiana must be self-propelled and thus have the capability of getting underway under their own power. Each Alternate Certification Riverboat Gaming Vessel, must obtain and maintain a USCG Certificate of Documentation as a non-seagoing recreational motor vessel. Alternate Certification Riverboat Gaming Vessels shall not be considered Class 1 structures as defined in Indiana Code 22-12-1-4, nor shall adjacent ancillary waterborne structures.

5. Upon satisfactory completion of the ABS Consulting alternate certification process, the initial Certificate of Compliance will be issued and presented to the gaming vessel owners by the IGC. Among other things, the Certificate of Compliance will serve as verification that the respective vessel is a self-propelled motor vessel and thus capable of getting underway under its own power.

SECTION 4

HULL AND SUPERSTRUCTURE

A. Interface

1. Early in the design phase, the Civil and Naval Architects are to establish the basic elements of interface between the hull and superstructure. These elements should be reviewed and approved by ABS Consulting prior to commencing construction of superstructure. Should an owner elect to initiate construction of the Hull or Superstructure prior to receiving the necessary ABS Consulting approvals, construction will still be monitored by ABS Consulting surveyors for accordance with the unapproved drawings and specifications. However, it shall be clearly understood that if drawings and specifications require changes to meet applicable rules and standards, appropriate changes to already fabricated sections will be required to obtain Alternate Certification. Completion of all such required changes in fabrication must be verified by, and accomplished to the satisfaction of, ABS Consulting surveyors and the Indiana Gaming Commission.

2. To ensure that adequate support structure exists, Civil Architect shall provide to the Naval Architect all necessary column and

deck loads, as well as locations of same, including loads induced by surging, pitching and inclinations.

3. Naval Architect shall provide the Civil Architect anticipated hull girder deflections based on the loadings received and dynamic loadings associated with anticipated wave action, including the anticipated maximum angle of inclination.

4. The Civil and Naval Architects shall work together to determine the adequacy of each other's findings, and utilize the most effective method of resolving any discrepancies, prior to submission to ABS Consulting for review.

B. Maximum Angle of Inclination

1. The maximum angle of inclination shall be calculated considering the effects of simultaneous wind and passenger heeling, free surface, wave effect, and any other external force for the intact condition, under all loading conditions, including while underway in the Applicable Marine Environment (ref. 46 CFR 171.080 - Subchapter S). Design criteria for superstructure and its structural connections to the hull shall be suitable for this angle, as well as for loads applicable to underway forces that may also come to bear. Engineering for connections of such things as electrical power, mechanical systems and ramps, etc. should consider this angle, as well as dockside elevation changes from possible fluctuations of water level
   a) Wind velocity used for wind heeling shall be at least the same as used to meet requirements of the IBC for the specific dock site.
   b) Environmental conditions including snow/ice loading shall be included in the considerations.
   c) Passenger heeling moment shall be as per 46 CFR 171.050.
   d) Free surface effect shall be considered.
   e) The wave loading shall be as applicable to site specific conditions.
   f) During the design phase, calculations verifying adequate water depth and, if appropriate, retaining wall to vessel clearance, giving due consideration to maximum inclination, shall be prepared and submitted to ABS Consulting (Houston) for review and approval.

C. Hull

1. Plans and/or specifications provided to ABS Consulting shall include materials of construction and structural shapes. Vessel designs shall be developed in accordance with ABS Rules appropriate for the Applicable Marine Environment.
   a) Where deemed necessary by ABS Consulting, 46 CFR Subchapter H, Subchapter S, Subchapter J, and Subchapter Q, may also be applied.
   b) In order to be considered for approval by ABS Consulting, vessel designs that vary from ABS Rules or federal regulations must instead be in accord with a recognized marine standard or code that is appropriate to a vessel's Applicable Marine Environment. Requests for approval of variations shall be made in writing, and shall include all supporting data and references to the specific alternative standards or codes being proposed.

2. Plans showing structural dimensions and thicknesses should be of sufficient detail, including welding, as well as all deck and column loading. Plans should be submitted to ABS Consulting for review and approval prior to initiation of construction and should, in general, include as a minimum:
   a) General Arrangement of hull(s), superstructure(s) and/or enclosures.
   b) structural profile
   c) structural deck plan
   d) structural sections and column foundations
   e) watertight doors and hatches
   f) bilge and ballast system (if installed)
   g) watertight bulkhead penetrations
   h) hull compartment and access plan

i) machinery installations, including all propulsion, navigation and/or steering systems

j) electrical installations (marine & IBC)

k) installed firefighting systems

3. The structure shall be adequate for support of the design loads specified by the naval and/or civil architects. Consideration must be given to effects of concentrated loads imposed by columns, multi-hull connections and external structures, mooring points, access structures, etc.

4. Details of structural continuity shall be provided. Structural members shall not change direction, or terminate, abruptly and shall be connected to adjacent structures such that hard spots, notches and other potentially harmful stress concentrations are avoided.

5. Where stiffeners are intended to be cut in way of deck or bulkhead penetrations, the openings are to be framed and bracketed to maintain original strength of the structure.

6. Where hull frames are intended to be altered, specific written request must be made by the participating Naval Architect and approved in writing by ABS Consulting.

D. Deck Loading and Column Connections

1. Distributive and point loading should be determined by engineering analysis at the time of preliminary design. To assure that the hull can withstand these imposed loads the structural plans should be approved by ABS Consulting prior to initiating hull construction.

   a) In the case of an existing vessel being converted for use as an Alternate Certification Riverboat Gaming Vessel, or an ancillary floating support platform, the hull structure must meet appropriate ABS Rules for construction and actual thickness gauge readings of the hull structure and shell plating shall be the basis for the analysis.

2. Columns that support superstructure and contact or penetrate the Main Deck shall be supported by suitable below deck foundations for adequate distribution of the imposed loads to the adjacent hull structure.

3. The foundations and the column to deck connections shall be reviewed and accepted by the Naval and Civil Architects of record and should be approved by ABS Consulting prior to initiating hull construction.

4. Deck capacity and point loading shall be considered when placing heavy equipment.

E. Interconnections - Multiple Hulls/Pontoons

1. Interconnections of multiple hulls shall be developed at the preliminary design phase, with consideration given to dockside and underway loading conditions, in line with the Applicable Marine Environment.

2. In the design phase, consideration shall be given to locations of fabrication, inter-connection and mooring, if different, since transportation could well impose structural loadings that would not be present after interconnections are completed.

   a) Complete longitudinal strength analysis with specific wave/weather criteria applied for worst anticipated transit condition, shall be performed.

   b) The structural connections shall be designed in accordance with a recognized marine construction standard/code appropriate to the Applicable Marine Environment and should be approved by ABS Consulting prior to initiating hull construction.

3. Any multi-hull assembly shall be considered as a single entity for purposes of performing transverse/longitudinal strength calculations.

   a) Complete longitudinal strength analysis based on design bending moment for the connected multi-hull units should be

approved by ABS Consulting prior to initiating hull construction.

F. Superstructures

1. Superstructures shall be structurally capable of withstanding repeated stresses reasonably anticipated to occur while the vessel is underway and maneuvering in the Applicable Marine Environment.

2. Superstructures on Alternate Certification Riverboat Gaming Vessels may be designed to comply with:
   a) ABS Rules or another recognized marine standard appropriate to the Applicable Marine Environment;
   b) the International Building Codes; or
   c) an acceptable combination of both.

3. IBC may only be applied where the owner establishes to the satisfaction of ABS Consulting that the IBC will provide at least an equivalent level of patron safety while dockside to that which presently exists on COI Vessels operating as dockside riverboat casinos in the State of Indiana.

4. Superstructures shall be fitted with approved emergency lighting system(s), and approved fire alarm system(s) per NFPA 12, as well as automatic sprinkler systems per NFPA 13 and/or the International Building Codes. If applicable IBC egress requirements are met, Out of Zone Refuge (OZR) for gaming patrons shall not be required.

5. If a superstructure is intended to meet the International Building Codes, the plans and specifications shall be signed and sealed by a Registered Architect and/or Registered Professional Engineer licensed in the State of Indiana and be should approved by ABS Consulting prior to commencing each construction phase, along with affidavits stating that Plans and Designs conform to requirements of the applicable codes with regard to the construction type, egress, and handicapped accessibility as well as all other general requirements. Structural designs and drawings shall conform to the International Building Codes and/or the applicable marine codes regarding strength, stress, strains, loads & stability while dockside and underway in the Applicable Marine Environment. Structural plans shall be signed and sealed by the structural engineer of record for the project.

6. Information submitted with plans shall include:
   a) Confirmation of Building Code Used
   b) Use Group Intended
   c) Mechanical
   d) Electrical
   e) Plumbing
   f) Sprinkler Drawings and Calculations
   g) Fire alarm system drawings & calcs.
   h) Type of construction
   i) Floor area per floor
   j) Building height
   k) Full description of superstructure
   l) Structural Calculations
   m) Number of exits
   n) Exit capacities
   o) Travel distance to exits
   p) Fire resistance rating for the following:
      - Shaft Enclosures
      - Stair Enclosures
      - Exterior Bearing Walls
      - Interior Bearing Walls
      - Fire Walls
      - Area Separation Walls
      - Exit Protective Walls
      - Occupancy Separations
      - Columns
      - Beams, Girders, Trusses
      - Floor/Ceiling Construction
      - Roof/Ceiling Construction

   q) In addition to Fire Resistance Ratings above the Main Deck, consideration shall be given to spaces/offices to be occupied by casino personnel that are located below the Main Deck, with regard to 46 CFR 72.05 and/or other applicable marine codes, inclusive of furniture and outfit.

SECTION 5

WELDING

A. Recognized Standards

1. In accordance with 46 CFR 70.35, method of construction, or testing shall meet the standards of the American Bureau of Shipping in effect at time of vessel construction.
2. All welding shall comply with recognized standards, such as ABS, AWS, etc. Others may be acceptable, but should be provided to ABS Consulting in the design phase for review and approval.

B. Acceptable Procedures

1. Welding shall, in all instances, produce welds having strength and toughness comparable to the base metal.
2. Written welding procedures, processes, techniques and positions, including types of joints and edge preparation, shall be developed by the fabrication facility and should be approved by ABS Consulting prior to initiating production welding.
   a) If production welding is initiated prior to receiving approval from ABS Consulting and discrepancies are found necessitating changes in procedures, processes, techniques, etc., it should be understood that all production welds already made will need to be removed and remade.
3. Welders shall be tested and certified in the established procedure/process and position for which they are utilized.
   a) Certification of all welders doing hull and structural welding should be accomplished by American Bureau of Shipping, however other recognized certifications will be considered, if requested .
   b) Copies of all welders certificates shall be made available to ABS Consulting.
4. Surfaces to be welded shall be free of moisture, grease, loose rust scale, or paint. Primer coatings of ordinary thicknesses may be left intact provided it has been demonstrated that they have no adverse effect in the production of satisfactory welds.
5. Slag and scale shall be removed from the surfaces to be welded on the original pass and again prior to subsequent weld passes.
6. Welds shall be visually inspected by ABS Consulting for compliance with approved drawings and specifications.

SECTION 6

NON-DESTRUCTIVE TESTING

1. Per 46 CFR 70.35, Non-Destructive testing of the welded connections in the hull structure shall be accomplished in accordance with applicable ABS Rules and/or as otherwise specified by the attending ABS Consulting Surveyor.
2. In the superstructure, non-destructive testing of the welded connections shall be conducted in accordance with directions of the Civil or Naval Architect, and/or as may be required by the applicable building code and/or building code inspector, in line with importance of the connection.

SECTION 7

DRAFT MARKS

A. General

1. Boat hulls shall have readily visible draft marks in, accordance with applicable U.S. Coast Guard Regulations and/or ABS Rules, installed on port and starboard sides near bow and stern. Draft marks shall be verified by an ABS Consulting Surveyor.
   a) If a boat is designed to operate dockside with the hull(s) submerged, draft marks shall be continued on prominent structure above those on the hull.

SECTION 8

USE OF SPACES BELOW MAIN DECK

A. Riverboat Gaming Vessel Hulls

1. Unless specifically approved by the Indiana Gaming Commission, no space below the Main Deck is to be utilized as a public area.
2. Spaces below the Main Deck normally manned by vessel crew and/or other casino personnel shall be fabricated and outfitted in accordance with 46 CFR 72.05.
    a) If a manned space under the Main Deck is situated below, or directly adjacent to, an IBC space, such under deck space, including overheads, columns, etc. may be made compliant with International Build-ing Codes for flame spread and fire resistive construction, as well as installed fire extinguishing systems, unless federal regulations used by the USCG for Sub-chapter H passenger vessels provide a higher degree of fire safety, in which case they shall apply.

SECTION 9

ACCESS TO SPACES BELOW MAIN DECK

A. Gaming Boats and Ancillary Floating Platforms

1. Access to and/or egress from areas below the Main Deck shall be considered at the preliminary design phase.
    a) Depending on location, watertight or weathertight doors shall be installed above the Main Deck at each access leading to below deck areas.
    b) There shall be at least two (2) means of escape from all general areas accessible to the casino personnel or where crew may normally be employed. At least one of these two means of escape shall be independent of watertight doors. (Ref.: 46 CFR 72.10.5)
2. Consideration should be given to future maintenance, repairs and surveys when developing the access and/or egress plan.
3. Where practical, access/egress should be via inclined ladderways.
4. All necessary openings in watertight bulkheads shall be suitably fitted with appropriate watertight closures, including those necessary for access, wiring, piping, ventilation, etc.
5. There shall be no inaccessible spaces/voids within the Hull.

SECTION 10

CLOSURES FOR OPENINGS IN AND/OR PENETRATIONS OF WATERTIGHT STRUCTURES

A. Hulls

1. The designs of watertight doors and manholes shall be in accordance with applicable ABS Rules such that they will maintain the same watertight integrity as the bulkhead or deck in which they are inserted. Each should be approved by ABS Consulting prior to commencement of Hull construction.
2. In occupied spaces below the Main Deck, openings in watertight subdivision bulkheads shall be provided with watertight doors fitted with position monitoring devices that are remotely monitored from an occupied space above the Main Deck.
    a) The watertight door monitoring location must be in a space that is manned 24 hours a day by personnel who are acquainted with watertight door operations and who understand the reason for maintaining watertight integrity within the hull.
    b) The door closure devices shall be operable locally from both sides of the bulkhead and it shall be possible to open and close the doors by hand.

c) Except as may specifically be authorized by ABS Consulting, all manually operated watertight doors shall be maintained in closed and fully dogged positions.

3. Watertight doors shall be of strength consistent with water pressure to which they may be subjected.

   a) Where stiffeners are cut in way of watertight door installations, openings shall be framed to restore original strength to bulkheads, without taking the strength of the door frames into consideration.

4. All penetrations in watertight structure for mechanical and electrical systems shall be made with marine type/grade watertight stuff-ing tubes, multi-cable transits or steel pipe couplings, to maintain watertight integrity.

   a) Where steel pipe couplings are used for electrical cable, watertight integrity shall be maintained by installation of rubber grommets & capture nuts, or other suitable means.

   b) Steel stuffing tubes, multi-cable transit frames and pipe couplings shall be weld-ed on both sides of plating they penetrate.

SECTION 11

FIRE PROTECTION

For all proposed new vessels and/or existing vessels being modified, drawings, specifications and/or engineering details submitted to ABS Consulting for review and approval must include details of the specific codes used and any waivers requested with regard to fire protection. It should be understood that all fire fighting systems, such as marine hydrant systems, fixed systems, and IBC sprinkler systems, that are operational while dockside are also expected to be operational if the vessel is intentionally underway. (Ref. 46 CFR 72.05)

A. Marine Structural Fire Protection

1. Except as might otherwise be permitted under Section 8.2a) of this Guide, the construction and arrangement of Alternate Certification Riverboat Gaming Vessel hulls shall be in compliance with 46 CFR 72.05 (Structural Fire Protection).

2. Fire protection for the Superstructure, including normally occupied casino patron and patron service spaces, as well as any casino crew and boat crew spaces adjacent thereto, on newly constructed Alternate Certification Riverboat Gaming Vessels shall be in accordance with applicable International Building Codes, except where the marine codes afford a higher level of safety while dockside. (Ref. 46 CFR 72.05)

3. Marine machinery and engineering spaces shall be afforded fire protection in accordance with 46 CFR 72.05 except where they are directly adjacent to IBC protected spaces, in which case the standard affording the greatest degree of patron safety, while dockside, will be applicable.

   a) In addition to Superstructure gaming areas and egress paths, it is strongly recommended that all other public areas, casino offices, break rooms, locker rooms, galleys, and mess rooms located within a newly constructed Alternate Certification Riverboat Gaming Vessel's Hull also be fitted with sprinkler systems.

B. Existing COI Vessels Opting for Alternate Certification

1. An existing COI Vessel operating as a dockside riverboat casino in the State of Indiana will be accepted "as-is" into the Alternate Certification program provided it satisfies Section 22 of this Guide.

2. After acceptance into the Indiana Alternate Certification program, such former COI Vessel may receive (and continue to receive) a Certificate of Compliance from ABS Consulting by either: (a) continuing to operate in accordance with applicable federal regulations for the design, construction, and operation of passenger vessels – including the

most recent COI issued to it by the USCG; or (b) seeking specific approval for structural and/or operational changes that accord with alternate standards set out in this Guide.

SECTION 12

BILGE ALARMS, BILGE PUMPING, WATER BALLAST AND BALLAST SYSTEMS

A. Hulls and Ancillary Floating Platforms

1. Quantities of ballast water used to maintain trim and/or stability should be determined by the naval architect and civil architect at the time of design.
   a) Permanent ballast such as poured concrete, concrete blocks, sand, scrap steel plate, etc. is not recommended.
2. Unless an approved permanently installed automatic ballasting system is installed, dewatering valves of all tanks containing ballast water shall be locked in their closed position and tagged with appropriate notices.
3. Considerations should be given to applying rust preventative in all ballast compartments.
4. Where water ballast is used and a ballast pumping system is installed, ballast tanks shall be fitted with vent pipes and sounding tubes in accordance with ABS Rules or another recognized standard appropriate to the Applicable Marine Environment.
5. Sensors for a central bilge alarm system shall be installed in bilges of unmanned watertight hull compartments, to indicate any significant accumulation of water.
6. Spaces below the Main Deck with sprinkler and/or hydrant system fire protection shall be provided with suitable means of dewatering each watertight sub-division involved.
7. Procedures shall be developed, dewatering equipment put in place and personnel trained in the removal of water from all watertight subdivisions in the event of fire or damage.

SECTION 13

VENTILATORS AND VENT PIPES

A. Hull Compartments

1. Design and installation of ventilation for below deck machinery spaces shall be in accordance with 46 CFR Subchapter H and/or applicable ABS Rules.
2. Vent pipes shall be installed in all below deck watertight void compartments to preclude the potential build-up of air or gas pressures.
   a) Vent pipes should be 2" minimum diameter and should originate from the uppermost area of the compartment and terminate at a suitable height above the Main Deck, with a 180° inverted elbow.
   b) Consideration should be given to down-flooding and the installation of ball check valves or other suitable means of closure.

SECTION 14

STABILITY

A. All Alternate Certification Gaming Vessels

1. While a vessel is in design stage, owners shall provide a preliminary stability study to ABS Consulting (Houston), using estimated light-ship displacement as well as longitudinal and vertical gravity centers. If the study demonstrates that vessel complies with intact and damage stability criteria outlined in 14A2 and 14A3 below using conservative estimated vertical center of gravity, only a deadweight survey is needed to confirm the vessel's lightship displacement and longitudinal center of gravity at completion. Otherwise, an inclining experiment will be required to confirm the vessel's vertical center of gravity location.
2. Vessels with ordinary proportion and form shall comply with intact stability criteria in 46 CFR 170.160, 46 CFR 170.170, 46 CFR 170.173 and 46 CFR 171.050. (Instead of

compliance with 46 CFR 170.173 the licensee may elect to comply with alternate criteria for vessels of unusual proportion and form, as may be acceptable to the IGC and/or ABSC.)

3. A Riverboat Gaming Vessel whose Applicable Marine Environment is on sheltered inland waters, or solely within a well protected harbor that it cannot reasonably exit at Lake Michigan's south shore, shall comply with damage stability criteria as outlined in 46 CFR 171.070 & 46 CFR 171.080, with 1 compartment standard of flooding, regardless of passenger capacity. An Alternate Certification Riverboat Gaming Vessel whose Applicable Marine Environment is open to Lake Michigan shall comply with 2 compartments flooded.

   a) In line with the diverse nature and basic construction of the many vessel hull forms employed in designs of dockside gaming vessels, consideration must be given to:
      - water levels
      - historical weather data
      - future intended use
      - superstructure design
      - gaming patron capacity
      - potential for flooding

   b) Acceptable stability is dependent on a vessel being designed with sound engineering principles, and obtaining satisfactory engineering review from ABS Consulting.

4. The following drawings and/or calculations should be provided to ABS Consulting for stability review and approval prior to completion of the vessel:
   - General Arrangement
   - Midship Section
   - Subdivision Plan
   - Profile Plan
   - As-Built Stability Study (Intact/Damage)
   - Lightship Weight and Center of Gravity Estimation

5. A stability test procedure should be submitted to the ABS Consulting Marine Engineering Department for review and approval, prior to conducting the test.

6. Upon completion the stability test data shall be submitted to the ABS Consulting Marine Engineering Department for review and approval. The vessel's stability will then be re-evaluated based on the lightship characteristics determined by the stability test.

7. Existing passenger and/or COI Vessels presently operating as dockside riverboat casinos will normally meet the stability requirements outlined herein. However, copies of existing stability documentation must be furnished to ABSC for review on behalf of the Indiana Gaming Commission.

SECTION 15

LONGITUDINAL STRENGTH

A. Hulls and Supporting Structures

1. Longitudinal strength calculations shall be performed according to ABS Rules or another recognized standard appropriate to the Applicable Marine Environment.

2. Longitudinal strength calculations shall be performed for all new construction vessels of ordinary proportion and form over 250' in length, and for all vessels having unusual configurations and/or loading conditions, regardless of length.

3. Strength calculations shall be performed for all new vessels of the box type configuration in both the longitudinal and transverse using longitudinal strength parameters.

4. Longitudinal strength calculations shall be performed on all pre-existing hulls proposed for use in conversion to Alternate Certification Riverboat Gaming Vessels regardless of length. Hull strength is to be analyzed using actual plate and structural shape thicknesses determined from a gauging survey (see Section 16.A.3.d.).

5. Longitudinal and transverse strength calculations shall be performed on all multi-hull boats regardless of length. The multi-hull units shall be treated as a single entity for these calculations.

6. All loads transmitted to a hull should be reflected in longitudinal & transverse strength calculations. Special attention should be paid to the loads from the superstructure, including column point loads.

7. In all cases where a water transit has been planned, or there is a potential for one, necessary wave and weather induced criteria should be applied to the longitudinal and transverse strength calculations.

SECTION 16

SURVEYS AND INSPECTIONS DURING NEW CONSTRUCTION, MODIFICATION, OR CONVERSION OF EXISTING VESSELS FOR ALTERNATE CERTIFICATION PROGRAM

A. Surveys and Inspections

1. During new construction of Alternate Certification Riverboat Gaming Vessels or conversion of existing vessels for use in the Alternate Certification program, necessary surveys and inspections will be carried out by qualified ABS Consulting marine surveyors and Building Code inspectors to confirm compliance with applicable marine standards, building codes, Indiana Gaming Commission rules, approved drawings, specifications, and/or recommended repairs and testing.

   a) ABS Consulting shall be given sufficient notice to schedule required marine surveys and building code inspections.

   b) Within three (3) normal working days of concluding marine surveys and building code inspections ABS Consulting will provide written notification to the Indiana Gaming Commission, the riverboat owner, naval architect and/or contractor, concerning any significant discrepancy found.

   c) Unless otherwise acceptable to the Indiana Gaming Commission, a Certificate of Compliance will not be granted to an Alternate Certification Riverboat Gaming Vessel until all discrepancies have been suitably corrected and follow-up surveys completed by ABS Consulting.

2. If any changes are proposed to an existing Riverboat Gaming Vessel after it enters the Alternate Certification program, inclusive of its hull, machinery, superstructure, and outfit, as well as any change in ballasting or other weights, the owner/operator must provide ABS Consulting with plans and specifications for the proposed changes well in advance of actually effecting the changes so as to allow sufficient time for engineering review and approval, as well as scheduling inspections.

   a) All such changes shall have been submitted to and approved by the vessel owner's participating naval architect and/or licensed structural engineer prior to submission to ABS Consulting.

3. For conversion projects:

   a) Existing vessels nominated for conversion(subsequent to appropriate internal cleaning, gas freeing, and venting), shall be subjected to a thorough visual condition assessment by ABS Consulting.

   b) The survey report shall describe apparent conditions of all deck, side, bottom and bulkhead platings, as well as all deck fittings, internal structure, access openings, closures, and hull piping, as well as significant fittings and fixtures.

   c) An ABSC marine surveyor will give special attention to planned attachment points for columns and appendages.

   d) All existing vessels nominated for conversion to Alternate Certification Riverboat Gaming Vessels must be internally cleaned and de-scaled as necessary, prior to being audio gauged by an independent gauging firm in the presence of an ABS Consulting marine surveyor.

e) The completed gauging report shall then be reviewed by the ABS Consulting Marine Engineering Dept.

f) The minimum requirements for thickness gaugings of each proposed Hull shall be:

- Three (3) girth belts of deck, sides, bottom and longitudinal bulkhead plating within the midship half length, together with adjacent internals.
- Transverse bulkhead plating, stiffeners and other areas as deemed necessary by the attending surveyor and/or naval architect.
- Gaugings of main longitudinal structure; including platings, associated structural members, stiffeners and brackets of decks, side shell, bottom shell and bulkheads, per the gauging report, are to be reviewed to determine amount of wastage and adequacy of the remaining structure for its new intended service.

4. During conversion special attention shall be paid to alignment of all column bases to under deck structure. Unless otherwise justified by the participating naval architect and approved by the ABS Consulting Engineering Department, misalignment shall not exceed one-half the thickness of the column web or under deck vertical supporting structure, whichever is the lesser thickness.

SECTION 17

MARINE MACHINERY AND SYSTEMS

A. General Acceptance

1. All machinery and associated systems presently installed on COI Vessels operating as dockside riverboat casinos in Indiana will be accepted under rules for Alternate Certification without exception, subject to satisfactory initial inspection by ABS Consulting.

2. For new vessels being built under rules for Alternate Certification, all marine systems shall be installed in accordance with ABS Rules and/or USCG requirements appropriate to the specific vessel involved and the Applicable Marine Environment in which it is intended to operate.

   a) Because Superstructures on Alternate Certification Riverboat Gaming Vessels are generally permitted to meet IBC, there will be points of interface between IBC and marine codes with regard to structure, electrical, mechanical, plumbing, fire protection and life safety systems.

   b) For each point of interface between IBC and marine codes, the standard providing the highest degree of patron safety and/or operational reliability while dockside will be accepted. Plans and specifications for such interfaces shall be submitted to ABS Consulting for review and approval.

3. Marine systems passing through Superstructures of newly constructed Alternate Certification Riverboat Gaming Vessels shall be reasonably equivalent to those found on COI Vessels now operating as dockside riverboat casinos in Indiana, and they shall be at least as intrinsically safe as required by IBC.

4. For new vessels being built under rules for Alternate Certification, all machinery, and systems required for underway operations, related to, but not necessarily limited to, propulsion, steering, electrical, bilge, ballast, fire fighting (sprinklers, hydrants, and other fixed systems), potable water, and sewage, shall be capable of operating independently of landside service connections. (Ref. 46 CFR 76.05 through 76.60 as applicable to the specific vessel.)

   a) Fire pumps must be of sufficient size for full operation of sprinkler and hydrant systems while underway.

   b) Bilge and ballast pump systems must be capable of full operation while underway.

   c) All life safety systems required when dockside, must be functional while

underway, unless a specific waiver is granted in writing by the IGC.

d) All connections between the vessel and landside facilities, utilities and other structures, while moored dockside, must be temporary in nature.

e) On-board potable water, toilet and sewage facilities shall be sufficient to support use by vessel's normal crew for a minimum of 8 hours while underway.

f) All machinery and systems installed aboard Alternate Certification Riverboat Gaming Vessels shall be submitted for review and approval by ABS Consulting.

SECTION 18

RIVERBOAT GAMING SUPERSTRUCTURES AND ADJACENT STRUCTURES THROUGH WHICH PATRONS MUST EXIT

A. Code Inspections of Superstructures and Adjacent Structures Through Which Gaming Patrons Must Exit

1. Plan reviews and code inspections pertaining to the original construction and modifications of Superstructures on the Alternate Certification Riverboat Gaming Vessels shall be conducted by ABS Consulting in general accordance with "punch lists" provided in the International Building Codes.

   a) All apparent discrepancies will be brought to the attention of the casino owner and their architect of record in writing with request for clarification and/or correction.

   b) Copies of all such correspondence will be forwarded to the IGC.

2. Plan reviews and code inspections of landside structures, including areas through which gaming patrons may egress, shall be conducted by the Indiana Department of Homeland Security, Division of Fire and Building Safety (DFBS) and/or other applicable local officials.

   a) Owners/operators shall provide ABS Consulting with prior written notification of any intent to seek and IBC variance from the Indiana Department of Homeland Security for an area in landside structures through which gaming patrons may exit. As deemed appropriate by the IGC, ABS Consulting may review plans and attend inspections scheduled by DFBS and/or local officials regarding those landside egress areas.

   b) Should it appear that non-compliant construction is contemplated or present in landside egress areas a written request will be made to DFBS for clarification.

3. The Certificate of Compliance will not be issued to a new dockside gaming vessel until all landside construction that may adversely affect egress of gaming patrons has been satisfactorily completed.

   a) After issuance of the original Certificate of Compliance, the vessel owner/operator shall provide written notice to the IGC, ABS Consulting, and DFBS prior to effecting any changes to the original egress ways.

   b) Should alterations of the egress ways be sighted by ABS Consulting incidental to routine vessel inspections, such discrepancies will be reported immediately to IGC and DFBS for appropriate action.

4. During original construction and any subsequent modifications, copies of all inspection and observation reports prepared by architects, engineers and special inspectors employed by the vessel owner/operator shall be kept at the job site for review by ABS Consulting.

5. If any item of significant non-compliance is not promptly corrected, as directed by ABS Consulting and/or the Indiana Gaming Commission, the gaming boat may be subject to penalty up to and including revocation of its Certificate of Compliance.

6. The owner shall provide ABS Consulting with adequate advance notice so as to be present for all final tests and inspections of life safety and systems, such as fire alarm, sprinkler

system, smoke evacuation, emergency power, etc.

a) Life safety systems must be tested in accordance with IBC requirements.

b) Final written reports containing the results of required tests and inspections shall be provided to the ABS Consulting building code inspector.

7. Any changes/modifications to plans for and/or specifications of the Alternate Certification Riverboat Gaming Vessel Superstructure, or any other marine structure through which casino patrons must exit, should be submitted to the ABS Consulting building code inspector for prior review and approval.

SECTION 19

ANNUAL AND SEMI-ANNUAL SURVEYS

A. General

1. At time of initial certification, the first annual survey of Hull, Superstructure and life safety systems will have been satisfied. Thereafter, semi-annual and annual marine surveys and building code inspections of the Alternate Certification Riverboat Gaming Vessel will be accomplished by ABS Consulting.

2. Unless otherwise directed by the Indiana Gaming Commission, all marine surveys and/or building code inspections can be initiated up to 90 days before the anniversary date of the vessel's entry date to the Alternate Certification program.

3. At time of survey, the surveyor and/or building code inspector shall be provided current drawings of Hull and gaming layout, along with overall facility maintenance documentation.

4. If discrepancies are found during survey and corrections are deemed necessary, the surveyor and/or building code inspector will coordinate re-inspections with the casino and later verify satisfactory correction of each discrepancy.

   a) Time limits will be set for correction of any discrepancies found.

5. Upon satisfactory completion of annual and semi-annual surveys and code inspections, Certificates of Compliance will be revalidated by ABS Consulting.

B. Marine Surveys

As appropriate to the specific vessel and survey period, the Hull, machinery, and marine related life safety systems will be surveyed/inspected in general accordance with guidance provided by the USCG Marine Safety Manual, Volume II, Chapter B1: Inspection of Vessels for Certification.

1. General inspection of Hull structure to verify there have been no changes to the approved facility that may affect structural and/or watertight integrity and/or stability and/or exiting requirements and confirm that suitable maintenance is being accomplished, including operational condition of watertight doors, closing devices and monitoring systems, as well as watertight bulkhead penetrations.

2. General inspection of machinery and associated systems to confirm that suitable general maintenance is being accomplished and that they are being kept fully operational. At a minimum, operational testing of the following will be accomplished:
   a) Main propulsion machinery, including overspeed trips
   b) Steering systems
   c) Electrical generators, including auto-matic activation due to loss of shore-power, and associated overspeed trips
   d) Emergency generator(s) as appropriate

3. General inspection of emergency lighting, ventilators, hatch covers, manhole covers and automated closing devices, as appropriate.

4. General inspection of fire fighting and lifesaving equipment, as required for the specific vessel, including verification that

handicapped accessibility has been maintained, as appropriate.

5. Witnessing tests of marine life safety systems, including general alarm, fire alarm system, sprinkler system, and hydrant system, as well as emergency lighting and power systems.

6. Fire drill, man overboard drill and medical emergency drill will be accomplished at the discretion of the surveyor with respect to timing and scenarios used. All designated vessel crew members on duty are expected to respond without hesitation and perform marine duties as first responders in accordance with the casino's approved emergency procedures manual, including crowd control. (Local fire departments may be included in the drills, if appropriate.)

7. General inspection of the facility to confirm that gaming layouts have not changed significantly from that permitted by the original structural review and/or ABS Consulting stability letter and/or amendments thereto.
   a) All proposed changes in gaming layouts are to be forwarded to the appropriate civil and naval architects for review and approval prior to making the changes.
   b) All changes in gaming layouts, outfit, etc. are to be documented by the casino and submitted to the Indiana Gaming Commission and ABS Consulting.

8. At least once in every 5 year period, the external underwater area of the Hull shall be inspected by divers under the direction of the attending ABS Consulting marine surveyor in accordance with 46 CFR 71.50-15 through 31.
   a) This Hull inspection is intended to reveal any unusual wastage wear and tear of the shell welds and shell platings that may be occurring.
   b) The 5-year extraordinary annual survey shall be accomplished at the same time as the normal annual Hull survey.
   c) Internal areas of Hull ballast tanks and voids shall also be inspected during the 5-year extraordinary annual survey.
   d) In the event that shifting/removal of ballast water is impractical in line with continuation of gaming operations, divers may also be employed in those areas under similar conditions as described in the applicable CFR's indicated above.

C. <u>Superstructure Inspections</u>

1. As appropriate to the specific newly constructed Alternate Certification Riverboat Gaming Vessel involved and the applicable survey period, inspections of the Superstructure will be accomplished in general accordance with the original punch lists specified in the IBC.

2. Whenever possible the initial annual and semi-annual IBC inspections will be accomplished concurrent with the initial annual and semi-annual marine surveys. However, any required follow-up surveys or inspections to clear discrepancies may well be accomplished independently at different times.

3. IBC inspections of superstructure will include but not be limited to:
   a) Physical structure
   b) Structural fire proofing
   c) Electrical
   d) Plumbing
   e) Egress
   f) Emergency and/or Life Safety Systems

4. With regard to IBC inspections, specialized technical assistance required for testing or evaluation shall be as required by IBC or as otherwise requested by ABS Consulting.

5. Fire alarm system, emergency lighting, emergency electrical system, hydrant systems, sprinkler systems and other vessel specific life safety systems shall all be demonstrated to the extent possible or appropriate.

<u>SECTION 20</u>

OPERATION MANUALS

A. General

1. Casino Owner and/or Operator shall develop written operating and maintenance procedures, which clearly spell out requirements for periodic self-inspection and maintenance of Hull, Superstructure and landside exiting structures, both interior and exterior. An inspection log shall be maintained and subject to audit by ABSC or IGC at any time.
   a) Interior tanks/voids should be inspected on an annual basis, or any time a change in attitude of the vessel is noted.
   b) Watertight closures to be periodically inspected to verify proper operation and any alarms associated with same.
   c) Alarms and alarm panel operation should be periodically tested and confirmed.
   d) Hull exterior should be inspected on a periodic basis to confirm that no damage has occurred and that allowable freeboard is not being exceeded.
   e) All mechanical and electrical equipment should be periodically inspected including, but not limited to, valves, piping, electrical connections, switchgear and motors.
   f) A copy of the operating and general maintenance procedures shall be submitted to ABS Consulting for approval.

SECTION 21

MOORINGS – PORT SAFETY & SECURITY

A. General

1. Mooring location and/or arrangements will be subject to requirements of the US Army Corps of Engineers and/or US Coast Guard.
   a) In addition to federal requirements stated in the U.S. Coast Guard Marine Safety Manual, Volume II, Materiel Inspection, Section B, Chapter 4, I (Vessels in Immobile Status), the specific mooring arrangement proposed for any Alternate Certification vessel shall be submitted to ABS Consulting for review and approval. The Indiana Gaming Commission may assist in the review to assure that moorings meet the intent of Indiana statutory requirements.
2. All vessels operating on or moored adjacent to the navigable waters of the United States, as defined by 33 CFR 2.05-25, fall within federal jurisdiction of the U.S. Coast Guard. It is and shall be the casino owner's responsibility to contact the appropriate U.S. Coast Guard office to determine any port safety and/or security requirements in place for the specific vessel and location.
3. Mooring arrangements at berths on navigable waters are routinely reviewed by the U.S.C.G. Captain of the Port (COTP) and/or Officer in Charge of Marine Inspections (OCMI) and will need to meet federal requirements stated in USCG Marine Safety Manual, Volume II, Materiel Inspection, Section B, Chapter 4, I, for Vessels in Immobile Status.

SECTION 22

ALTERNATE CERTIFICATION OF EXISTING COI VESSELS OPERATING AS DOCKSIDE RIVERBOAT CASINOS IN THE STATE OF INDIANA

A. General Procedure

1. Should the owner of an existing COI Vessel that is operating as a dockside riverboat casino in Indiana wish to "opt-in" to the Alternate Certification program, said owner shall forward a written request for Alternate Certification to the Indiana Gaming Commission.

2. The Indiana Gaming Commission will advise ABS Consulting of the request.

3. ABS Consulting will contact the casino owner and request acknowledgement of a memorandum of understanding regarding direct payment of invoicing and ABS Consulting working solely on behalf of the IGC.

4. Following written acknowledgement of the memorandum of understanding. The casino shall provide ABS Consulting current copies of the following drawings and data:
   - General arrangement drawings
   - Stability data and approval letter
   - Lifesaving equipment and arrangement
   - Fire control plan
   - Structural drawings
   - USCG Certificate of Inspection

5. In accordance with the USCG Marine Safety Manual, Vol. II, Section B, Chapter 4, I (Vessels in Immobile Status), the casino owner shall contact the USCG for direction, oversight and approval.

6. The IGC and/or ABS Consulting will work with the casino and/or the USCG as necessary to assure that the appropriate safety standards for patrons have been clearly established and designated in writing.

7. The casino operator shall notify the local Fire Chief/Fire Marshal that the specific Riverboat Gaming Vessel is being considered for "Alternate Certification" status. Notification should include advice that the safety inspection and certification responsibility for the boat is being transferred from the USCG to IGC/ABS Consulting. It should also include a request for a meeting prior to the changeover to review the riverboat's fire safety plan.

8. Upon agreement from USCG and satisfactory completion of required Alternate Certification marine surveys and IBC inspections, ABS Consulting will forward its reports confirming that the riverboat casino is fit for its intended purpose, to the Indiana Gaming Commission and a Certificate of Compliance will be issued.

SECTION 23

FORMS FOR ANNUAL AND SEMI-ANNUAL SURVEYS OF DOCKSIDE RIVERBOAT GAMING VESSELS OPERATING UNDER ALTERNATE CERTIFICATION

A. General Description

1. Survey forms included as part of this guide are intended only to assist ABS Consulting Marine Surveyors doing the hull inspections.

2. Survey forms are not intended to limit the inspections. Each Marine Surveyor will determine the depth of inspections necessary based on his knowledge and experience as well as guidance afforded in the USCG Marine Safety Manual, Volume II, Chapter B1.

3. Where appropriate the forms indicate general references to the CFR's, or USCG NVIC's that may be applicable. Many of the inspection items have been derived from the USCG 840 hull and machinery inspection books, specifically for application to dockside casino boats. Other items included are based on the unique experience of ABS Consulting.

B. Application of Inspection Items

1. Ex-COI vessels will not be subject to the additional IBC inspection unless modifications to the original structure, outfit or arrangement, which implicate the IBC, are made after acceptance into the Alternate Certification program. Assuming the IBC is not involved, the attached forms are representative of the required surveys.

2. All new vessels with Superstructures built in whole or in part to the International Building Code, will be subject to Annual and Semi-Annual Building Code Survey, in addition to items listed in the marine survey forms.

3. Annual and Semi-Annual Survey Forms for Marine Items

    a) Annual Hull Survey (See Attached)

    b) Annual Machinery Survey (See Attached)

    c) Semi-Annual Lifesaving Equipment Survey (See Attached)

    d) Semi-Annual Fire Protection, Detection and Extinguishing Equipment (See Attached)