

U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

2100 Second Street, S.W.
Washington, DC 20593-0001
Staff Symbol: G-MOC-2
Phone: (202) 267-0496
FAX: (202) 267-0506
tsliwinski@comdt.uscg.mil

16711/DIXIE ENDEAVOR

NOV 17 2005

Alario & Associates, LLC
Attn: [REDACTED]
P.O. Box 23525
New Orleans, LA 70183-0525

Dear Mr. [REDACTED]:

I have reviewed your request dated June 7, 2005, to authorize additional offshore workers on board the liftboat M/V DIXIE ENDEAVOR, O.N. 1115290. Your request to carry up to 66 offshore workers in addition to the crew is conceptually approved subject to the following comments:

1. In reviewing your request, I determined that the 46 CFR Subchapter L standards are not sufficient for the Coast Guard to approve more than 36 offshore workers. Likewise, 46 CFR Subchapter I-A contains no authority to approve restricted service. In order to facilitate the industry need to carry additional offshore workers, I have decided to authorize certification of this vessel under the authority of 46 CFR Subchapter I with the unique characteristics of self-elevating units being addressed by Subchapter L. This approach is similar to that used in the past to bring liftboats into certification, as described in Navigation and Vessel Inspection Circular 8-91.
2. Subchapter I provides standards exceeding Subchapter L, that allow for the carriage of more than 36 "industrial personnel". By using the Subchapter I standard, I can allow the carriage of more than 36 offshore workers on board this Offshore Supply Vessel, certificated under Subchapter I.
3. Additionally, for international voyages, the vessel must also meet the applicable SOLAS requirements and have all appropriate SOLAS documentation. The SOLAS standards for cargo ships are acceptable for this purpose. The determination issued on June 1, 2005 by this office that SOLAS Chapter II-1 Regulation 12-1 is not practicable or compatible with the design or proper working of a liftboat remains valid and fitting of a double bottom will not be required. A copy the double bottom determination letter should be maintained aboard the vessel as documentation for port state control purposes. No passengers (as defined by SOLAS) may be carried.
4. The following operational restrictions and additional requirements are a condition of this approval:
 - a) No passengers as defined by 46 USC 2101(21) may be carried, except in an emergency.
 - b) Down-hole work is limited to well intervention on completed wells.

16711/DIXIE ENDEAVOR

- c) A Coast Guard approved pre-loading and jacking procedure must be included in the approved operating manual.
- d) A sight dive survey or other equivalent bottom survey is required prior to loading greater than 36 offshore workers.
- e) The vessel must be capable of making safe refuge prior to onset of conditions (wind, wave heights) exceeding stability restrictions in the approved operating manual.
- f) The vessel must have an Emergency Evacuation Plan (EEP).
- g) Install GMDSS in accordance with 47 CFR 80.1074 and NVIC 3-99.
- h) Portable Quarters installation shall be in accordance with the guidance in the Marine Safety Manual, Vol. II, Section B, Chapter 8.F.1-9 (*available on the web: <http://www.uscg.mil/hq/g-m/nmc/pubs/msm/v2/bch8.pdf>*).

This concept may be applied to other liftboats on a case-by-case basis, subject to the approval of Commandant (G-MOC). Should you have any questions or concerns regarding this conceptual approval, please contact Mr. [REDACTED] at the telephone number listed above.

Sincerely,

[REDACTED]

M. B. KARR
Captain, U. S. Coast Guard
Chief, Office of Compliance
By direction

Encl: (1) Background and Summary of Amended Liftboat Standard - November 2005

Copy: LANTAREA (m) w/encl
CCGD8 (m) w/encl
Marine Safety Center w/encl
Commandant (G-MSO-2) w/encl
Commandant (G-MSE)

NOV 17 2005

Background and Summary of Liftboat Standard for the Carriage of More than 36 Offshore Workers – November 2005

Background:

- The Subchapter L limit of 36 offshore workers in addition to the crew originally came from the SOLAS Special Purpose Vessel Code. An examination of SOLAS reveals that the carriage of more than 36 persons is a common breakpoint for increased structural fire protection requirements (*SOLAS Chapter II-2 Reg. 16, 26, 27, 41-1 and 41-2*). The existing structural fire protection requirements for Subchapter L vessels are minimal (*see 46 CFR 127.220*).
- Prior to the publication of Subchapter L, Liftboats were brought into certification in accordance with NVIC 8-91, under Subchapters T or I, as supplemented by sections of Subchapter I-A to address the unique characteristics of self-elevating units.
- The Coast Guard's past policy as documented in the preamble of the Subchapter L Final Rule (FR Vol. 62, 19 Sep 1997) states that if a liftboat is intended to carry more than 36 offshore workers, then it must meet the rules of an appropriate vessel class (*e.g. Subchapter T or H, applicable passenger vessel rules*).
- On June 1, 2005 Commandant (G-MOC) responded in a letter to Mr. [REDACTED] with the determination that the SOLAS Chapter II-1 Regulation 12-1 was not practicable or compatible with the design or proper working of a liftboat and thus the fitting of a double bottom was not required.
- On June 7, 2005 Alario & Associates submitted a request to Commandant (G-MOC) for additional offshore workers to be authorized onboard the liftboat M/V DIXIE ENDEAVOR, O.N. 1115290. Upon review of this submittal, Commandant (G-MOC) determined that Subchapter L contained no authority for the Coast Guard to authorize more than 36 offshore workers under Subchapter L. Since Subchapter I-A similarly contained no provision for *restricted service*, Subchapter I was determined to be most appropriate for a liftboat desiring to be authorized more than 36 offshore workers in restricted service.

ENCLOSURE(1)

NOV 17 2005

Background and Summary Liftboat Standard for the Carriage of more than 36 Offshore Workers – November 2005

Subchapter I is authorized for the certification of certain liftboats desired to exceed the authority of Subchapter L by exceeding the limit of 36 offshore workers.

PLUS

Subchapter L is to be utilized to address the unique characteristics of self-elevating units.

PLUS

Operational Restrictions and Additional Requirements:

- No passengers as defined by 46 U.S.C. 2101(21) may be carried, except in an emergency.
- Down-hole work is limited to well intervention on completed wells
- A Coast Guard approved pre-loading and jacking procedure must be included in the approved operating manual
- A sight dive survey or other equivalent bottom survey is required prior to loading greater than 36 offshore workers
- Vessel must be capable of making safe refuge prior to onset of conditions (wind, wave heights) exceeding stability restrictions in the approved operating manual
- Submit Emergency Evacuation Plan (EEP) for approval
- Install GMDSS iaw 47 CFR 80.1074 and NVIC 3-99
- Portable Quarters installation shall be in accordance with the guidance in the Marine Safety Manual, Vol. II, Section B, Chapter 8.F.1-9
(available on the web: <http://www.uscg.mil/hq/g-m/nmc/pubs/msm/v2/bch8.pdf>) .

International voyages: The vessel must also meet the applicable SOLAS requirements and have all appropriate SOLAS documentation. The SOLAS standards for cargo ships are acceptable for this purpose. No passengers (as defined by SOLAS) are authorized.

ENCLOSURE(1)