

U.S. Department of  
Homeland Security

United States  
Coast Guard



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United States Coast Guard

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A handwritten signature in blue ink, appearing to read "Eric P. Christensen".

From: ERIC P. CHRISTENSEN, CAPT  
COMDT (CG-CVC)

To: Distribution

Subj: ENDORSEMENT OF OFFSHORE SUPPLY VESSELS (OSV) AS OIL SPILL  
RESPONSE VESSELS (OSRV)

Ref: (a) Federal Register/ Vol. 76, No. 238/ Monday, December 12, 2011/ Rules and  
Regulations 77128-77131, Part 126  
(b) 46 CFR Subchapter L

1. Purpose. This policy provides guidance for Officers in Charge, Marine Inspection (OCMI) on endorsing the Certificate of Inspection of an Offshore Supply Vessel as an Oil Spill Response Vessel.
2. Action. OCMI's and their designated representatives shall bring this policy to the attention of appropriate individuals in the marine industry & CG inspectors, and use these guidelines in endorsing an OSV with an OSRV endorsement as permitted by reference (a).
3. Directives Affected. None.
4. Background. The Coast Guard Authorization Act of 1996, in addition to providing for the inspection and certification of OSRVs, exempted small and dedicated OSRVs from the tank vessel requirements found in Title 46, United States Code (46 USC) Chapter 37. Small OSRVs were defined as less than 500 gross tons as measured under 46 USC section 14502, or an alternate tonnage determined by the Secretary. At that time, OSVs were limited in size to 500 gross tons, and were thus eligible to be certificated as OSRVs without being subject to tank vessel regulations. However, many newer OSVs have been constructed under the alternate tonnage framework established in 1996 and therefore do not have a gross tonnage as measured under 46 USC 14502 of less than 500 gross tons. Therefore, these vessels were precluded from also being certificated as OSRVs, unless they met tank vessel standards.

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CG-CVC Policy Letter

No. 12-03

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In May 2000, the Marine Safety Manual (MSM), Vol. II: Material Inspection was revised, cancelling and incorporating all previous OSRV construction and inspection policy. The Coast Guard recognizes that the MSM does not adequately address OSRV construction and inspection guidance for large, multi-service vessels. Additionally, experience with the cleanup of the 2010 Deepwater Horizon oil spill generated interest for expanding spill response capability and capacity by using certificated OSVs as OSRVs. Consequently, we are revising our standards for large, multi-service OSRVs.

5. Discussion.

- a. Over the past year, various companies have submitted requests to add the OSRV endorsement to several of their OSVs' Certificate of Inspection (COI). While the Coast Guard's policy was under revision, as an interim solution, the Coast Guard approved the requests permitting those vessels to be placed into service as non-dedicated OSRVs while retaining their current certification as OSVs under 46 CFR subchapter L (see reference b). The approval letters authorized the cognizant OCMI to issue a COI with an endorsement authorizing the vessels to operate as an OSRV when a spill response authority (most likely the federal on-scene coordinator) determines that such carriage is necessary during an oil spill emergency. However, this is permitted only when the amount and type of recovered oil carried is within the OSV carriage authority (combustible liquids not to exceed 20% of their deadweight). Additionally, if increased safety measures, such as maintaining a classification notation as an oil spill recovery vessel are met, the vessels could be permitted to store more than 20% of their deadweight in recovered oil. This interim solution was responsive to industry's practical needs while complying with the Coast Guard's existing regulations for carriage of combustible liquid cargoes on OSVs.
- b. As part of the revision to OSRV standards, the Coast Guard recently established an alternate size threshold based on the measurement system established under the International Convention on Tonnage Measurement of Ships, 1969, for OSVs that are properly certificated under 46 CFR Subchapter L. The interpretive rulemaking added a new section in Subchapter L that allows OSVs under 6,000 gross tonnage (GT ITC) to be certificated as an OSRV, and remain exempt from the tank vessel requirements in 46 USC Chapter 37. This interim rule became effective December 12, 2011 (76 FR 77128).
- c. The rule states: *An offshore supply vessel certificated under this subchapter [reference (b)] that is less than 500 gross register tons (GRT) as measured under section 14502 of Title 46, United States Code, or 6,000 gross tonnage (GT ITC) as measured under section 14302 of Title 46, United States Code when GRT is not assigned, may also be certificated as an oil spill response vessel.*



6. Policy. Offshore supply vessels certificated under 46 CFR Subchapter L that are less than 500 gross register tons (GRT), or 6,000 gross tonnage (GT ITC) may submit requests to the cognizant OCMI requesting certification as an oil spill response vessel. Sector Commanders and OCMI shall utilize the guidance in this policy letter for the issuance of OSRV endorsements. If the vessel meets the criteria specified above, the Cognizant OCMI is authorized to endorse the vessel's COI stating:

*a. This vessel may be operated as an OSRV for the recovery and storage of Grade D, as defined by 46 CFR Subchapter D, and lower recovered oil, in quantities up to 20% of the vessel's deadweight.*

Additionally, if the OSV maintains an oil spill recovery notation from a classification society authorized to issue international certificates on behalf of the Coast Guard, the cognizant OCMI is authorized to endorse an OSV's COI stating:

*b. This vessel may be operated as an OSRV for the recovery and storage of Grade D, as defined by 46 CFR Subchapter D, and lower recovered oil, in quantities exceeding 20% of the vessel's deadweight when response authorities determine such carriage is necessary during an oil spill emergency.*

The specific grade of recovered oil authorized should align with the OSVs existing bulk liquid cargo authority. If the OSV is only authorized to carry Grade E cargoes or mud, the endorsements should be amended accordingly. OCMI are encouraged to convert the deadweight limitation into vessel-specific terms, such as barrels or by authorized tanks, to facilitate clearer communication of the 20% limit to the vessel crew.

Nothing in this policy limits the OCMI from authorizing the carriage of greater quantities or higher grades of recovered oil when the circumstances of a specific oil spill emergency dictate the need for additional resources.

7. Questions. Questions concerning this policy and guidance should be directed to COMDT (CG-CVC), Office of Commercial Vessel Compliance, Domestic Compliance Division, at [CG-CVC-1@uscg.mil](mailto:CG-CVC-1@uscg.mil). This policy and other Domestic Vessel Policy documents are posted on Homeport at <http://homeport.uscg.mil/USVsIs>.

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