U.S. Department of Homeland Security
United States Coast Guard

Commandant
United States Coast Guard

2703 Martin Luther King Jr Ave SE
Mail Stop 7509
Washington, DC 20593-7509
Staff Symbol: CG-ENG
Email: CGENG@uscg.mil

16714
CG-ENG Policy Letter
No. 01-16, CH-1
May 30, 2025

From: J. R. Doherty, CAPT
COMDT (CG-ENG)

To: Distribution

Subj: PORTABLE ACCOMMODATION MODULES (PAM) GUIDANCE

Ref: (a) ABS Requirements for Portable Accommodation Modules (January 2025)
(b) COMDTINST 16000.76, Marine Safety: Outer Continental Shelf Activities
(c) Navigation and Vessel Inspection Circular No. 09-97, Change 1 – Guide to Structural Fire Protection
(d) Marine Safety Center Technical Note 04-95, as amended – Lightship Change Determination; Weight-Moment Calculation vs. Deadweight vs. Full Stability Test

1. PURPOSE. This policy letter provides guidance on Coast Guard standards for design, plan review, installation, inspection, and documentation of Portable Accommodation Modules (PAM) built for and/or installed on inspected vessels and floating Outer Continental Shelf (OCS) facilities.

2. DIRECTIVES AFFECTED. This policy supersedes CG-ENG Policy Letter No. 01-16, dated April 29, 2016.

3. ACTION. Officers in Charge, Marine Inspection (OCMI) may verify that PAM are reviewed, certified, and installed on inspected vessels and floating OCS facilities in accordance with this policy. Fabricators of PAM, Authorized Classification Societies (ACS) and vessel/facility operators should refer to this policy to assist in the design, plan submission, and installation phases.

4. BACKGROUND.
   a. The installation of PAM on inspected vessels and floating OCS facilities has become an increasingly common industry practice as Outer Continental Shelf (OCS) activities have extended toward deeper waters. As OCS activities, and installations of PAM, increase across different OCMI zones, it is important to ensure consistency among approving Coast Guard offices.

   b. Under the plan approval and inspection regulations of the relevant subchapter in Title 46 of the Code of Federal Regulations (CFR), the Coast Guard is responsible for the construction, arrangement, and equipment of shipboard spaces, of which PAM are a portable version. Coast Guard regulations require that certain alterations on inspected

vessels and OCS facilities be evaluated for their impact on safety by the OCMI.[1] PAM are a type of enclosed space and therefore subject to the inspection regulations applicable to the "host" vessel or facility. The design, installation, and function of PAM may pose a hazard to the personnel inside, adjacent spaces, or even the structure and stability of the host vessel. Therefore, installation of PAM, which is an alteration to an inspected vessel or facility, must be evaluated for the impact on safety by the OCMI.[2] Similarly, PAM installed onboard an OCS facility may itself constitute or otherwise cause deficiencies or hazards under the applicable regulations.[3] However, the risk these spaces present is mitigated by plan review, construction verifications, and post-installation inspections.

c. This policy provides guidance on those verification processes and additional recommendations for documentation and placarding to facilitate efficient installation of PAM on different host vessels. This Change 1 to the policy letter updates the guidance to the OCMIs to aid and streamline PAM compliance verification and reduce duplication of efforts. It aligns the Coast Guard approach to plan review, survey, and documentation processes with those of ACS, such that the OCMI may determine that certain PAM installations do not require a separate Coast Guard plan submittal or inspection. In addition, enclosure (1) has been modified to include design standards applicable to PAM developed by both ABS and DNV. The Coast Guard may update enclosure (1) to include other ACS design standards in the future.

5. POLICY. The following guidance is provided to OCMIs, fabricators of PAM, ACSs, and vessel/facility operators to facilitate consistent application of standards for PAM. In accordance with regulations for OCS facilities[4], only PAM installed on floating OCS facilities (FOF) are subject to this policy, and the terms "facility" or "facilities" refers to FOF.

a. *General*.

i. The guidance in this policy applies to PAM that are installed on a host vessel/facility that is certificated by the Coast Guard. For this policy, PAM are defined as any non-integral enclosed space that is installed on a host vessel or facility, and occupied by personnel for berthing, recreational, service, or industrial purposes. The Coast Guard has identified two categories of PAM:

1. Certain PAM, due to their constructed purpose and installed equipment, present inherently lower risk to the host vessel/facility and are identified in the policy as PAM-IM. PAM-IM are PAM that meet the definition of industrial module in

[1] See e.g., 46 CFR Parts 31, 91, 107, 126; 33 CFR Parts 140, 143.
[2] See e.g., 46 CFR 31.10-25, 91.45, 107.271 or 126.150.
[3] See e.g., 33 CFR 140.105.
[4] See, 33 CFR 140.10 (defining "floating OCS facility").

reference (a) and include laboratories, workshops, wireline units, mud logger rooms, ROV control rooms, dive control rooms, or any other similar spaces.

2. Sleeping cabins, offices, hospitals, recreational spaces, dining spaces, lavatories, galleys, laundries or similar spaces should not be considered PAM-IM.

The guidance in this policy applies to PAM that do not exceed length, width, and height dimensions of 46ft x 16ft x 10ft, as described in the general applicability of Section 1/5 of reference (a). While this guidance can be used for PAM that exceed these dimensions and other types of portable modules, such cases must be reviewed by the Marine Safety Center on a case-by-case basis and may not be reviewed by an ACS.

ii. PAM-IM, which present comparatively lower risk than other types of PAM, may be accepted by the Coast Guard without submission of plans, or without inspections during construction or installation under certain circumstances, as discussed below.

iii. For tonnage measurement purposes, PAM are portable enclosed spaces (also referred to as temporary deck equipment), and their volumes are subject to inclusion in tonnage. Per 46 CFR Part 69, the vessel owner is responsible for contacting an authorized measurement organization for a remeasurement following PAM installation and removal, except where allowed by a tonnage certificate. Should the measurement organization reissue a tonnage certificate, the OCMI and vessel owner should be aware that different requirements could apply to the vessel based on the reassigned tonnage.

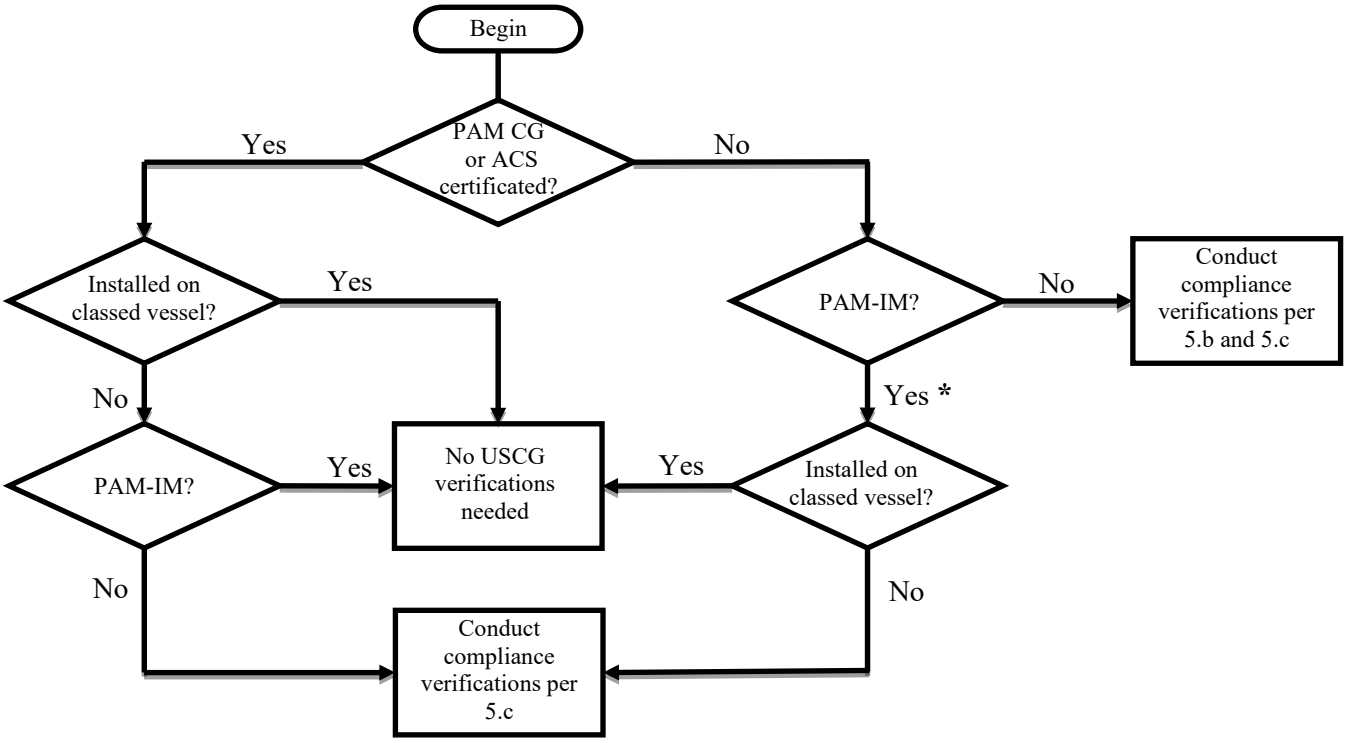
iv. ACS authorized to conduct inspections on behalf of the Coast Guard may use the standards listed in enclosure (1) and their Rules to certify PAM and approve their installation on host vessels/facilities. Surveys and design verification of PAM by ACS are to follow ACS requirements and not Figure 1.

ACS should be aware that the Coast Guard may identify specific PAM-IM as presenting sufficient risk that warrant application of stricter design or verification measures. See the footnote in Figure 1 for more description. Questions whether PAM-IM should be specially identified should be addressed at the earliest opportunity with the cognizant OCMI.

ACS surveying installed PAM or specially identified PAM-IM must notify the OCMI, as the addition or removal of PAM on host vessels or facilities may have manning implications.

v. In accordance with the regulations, submission of plans related to PAM and PAM inspections are to be conducted when deemed necessary by the OCMI. While the OCMI has discretion, Figure 1 should be used to determine the appropriate Coast Guard activity based upon the risk presented to the host vessel, crew and cargo.

For PAM certificated by an ACS and installed on a classed vessel, the OCMI may accept the ACS certification of PAM and/or their installation in lieu of Coast Guard verification.



* The OCMI may determine that installation of specific PAM-IM presents unusual risk to the host vessel or facility that warrant additional safety measures. These specially identified PAM-IM follow the policy in paragraphs 5.b and 5.c or other processes to the satisfaction of the OCMI. The specific concerns for this determination must be based upon the function, location, construction or other unusual basis, and documented by the OCMI in MISLE.

Figure 1. Flowchart for Coast Guard Verification Activity

b. *Design and Construction*.

i. This section applies to the design and construction of PAM for certification by the CG as indicated in Figure 1.

ii. PAM will be assigned a design certification that corresponds to the subchapter requirements of the host vessel/facility on which it is intended to be installed; D, I, I-A, L < 36 Offshore Workers (OSWs), L >36 OSWs, SOLAS.

iii. PAM should be fabricated to the design review standards listed in enclosure (1).

iv. PAM may be built to an alternative standard which provides an equivalent level of safety to the standards listed in this policy. Requests to authorize the use of alternative standards should be submitted to the Marine Safety Center for approval.

v. Prior to beginning fabrication or alteration of PAM, the PAM owner should apply for inspection to the cognizant OCMI clearly stating the approval(s) being sought for the PAM (D, I, I-A, L (<36 OSWs or >36 OSWs), SOLAS). When multiple subchapters are applicable, the most stringent requirements should be applied.

vi. For new fabrication of non-classed PAM, construction engineering plans and specifications should be submitted to the Marine Safety Center for approval. Proposals for alterations to existing PAM should be submitted to the cognizant OCMI for approval. The OCMI in conjunction with the Marine Safety Center will determine the level of plan review for the given proposal. Reference (a) and enclosure (2) contain information regarding plans and data to be submitted.

c. *Installation and Inspection*.

i. This section applies to installation and inspections of PAM for verification by the CG as indicated in Figure 1.

ii. Prior to installing PAM, the operator should apply for inspection to the cognizant OCMI or notify the cognizant ACS, as appropriate, clearly stating the purpose, general arrangement, and intended period for which the module is to be on board. Additionally, engineering plans detailing the installation on the host vessel/facility should be submitted to the Marine Safety Center or ACS in accordance with Section B of enclosure (2). These installation engineering plans are different than the construction engineering plans discussed in paragraph 5.b.v.

iii. The addition or removal of PAM on vessels/facilities may have manning implications. To prevent unnecessary delays in the PAM installation or amendments to the COI, the operator should notify the cognizant OCMI to address the addition of any personnel and discuss any potential additional requirements due to these changes.

iv. PAM systems such as fire detection, general alarm, public address, and sanitary piping should be integrated into the host vessel/facility systems. Particular attention should be given to the increased electrical loads, deck penetrations, capacity of marine sanitation device, and compatibility of PAM fire detectors with the host vessel/facility main fire detection system. All piping and electrical connections should adhere to structural fire protection and watertight boundary penetration requirements of the host vessel/facility. Stairways, ladders, and gratings that are part of the means of escape should be constructed of steel.

v. Host vessel/facility operators must have an accurate accounting of the stability changes that result from the addition of PAM. It is important to note that an increase in the number of personnel onboard the host vessel could change the damage stability requirements. The vessel owner must meet the applicable damage stability requirements for the total number of people accommodated onboard the vessel. The vessel owner is responsible for accounting for stability changes upon PAM removal and returning the host vessel to its previous condition. If the OCMI believes that vessel stability is in doubt, they should contact the Marine Safety Center.

vi. For removal of PAM from a host vessel/facility, the operator should apply for inspection to the cognizant OCMI, as appropriate, clearly stating the purpose. Additionally, the host vessel/facility must be returned to "pre" PAM installation condition which should be identified in previously approved drawings. However, if the vessel/facility is not being returned to "pre installation" condition, all modifications/alterations should be identified, examined and approved as appropriate.

vii. Inspection of PAM should be carried out in accordance with the guidance outlined in enclosure (3).

d. *Documentation*.

i. This section applies to all PAM.

ii. PAM certificated by the Coast Guard are assigned a Coast Guard Number and is tracked in the Marine Information for Safety and Law Enforcement (MISLE) database. Refer to Section G.1.K.3 of reference (b) for MISLE data entry guidance.

Each Coast Guard certificated module should have a placard permanently attached to the module listing approval specifications. Refer to enclosure (4) for additional guidance on documenting these PAM.

iii. ACS should provide the OCMI identification information when certificated PAM are installed on US flag vessels. The information should be sufficient to ensure the host vessel or facility documentation can be properly updated, and to facilitate efficient future transfers of that PAM to other hosts.

iv. The owners of PAM should maintain, for each individual module, a booklet that contains all documents pertaining to its design and use. At a minimum, the following documentation should be retained for the life of the PAM, and made available to the marine inspector upon request:

1. General Arrangement Drawing
2. All approved plans for fabrication/alterations
3. Certification approval letter
4. Record of repairs, modifications, and associated documentation

5. Record of installations (vessel/facility name & official number; dates installed & removed)

v. Upon removal of the PAM(s) from the host vessel/facility, the host vessel/facility documents, including stability letter, should be updated to reflect the current condition. The PAM removal should be recorded in the MISLE database for the vessel/facility only.

6. DISCLAIMER. While the guidance contained in this document may assist the industry, public, Coast Guard, and other Federal and State regulators in applying statutory and regulatory requirements, this policy is not a substitute for applicable legal requirements nor is it a regulation itself. Thus, it is not intended to nor does it impose legally binding requirements on any party outside the Coast Guard.

7. CHANGES. This policy letter will be posted on the web at CG-ENG Policy (uscg.mil) (https://www.dco.uscg.mil/CG-ENG/Policy). Changes to this policy will be issued as necessary. Any questions concerning this policy should be directed to Commandant (CG-ENG), Commercial Regulations and Standards Directorate, Office of Design and Engineering Standards at CGENG@uscg.mil.

#

Enclosure: (1) Design Standards
(2) Plan Review Guidance
(3) Inspection Guidance
(4) Documentation Guidance

Distribution: HQ Offices
All Area/District (p)
Marine Safety Center
All Sectors/MSUs/MSDs (p)
Authorized Classification Societies

Design Standards

Acceptable PAM design standards are described in paragraphs A or B below. Regardless of alternative A or B, the occupancy limitation for berthing spaces is to comply with the applicable host vessel/facility requirements for accommodation spaces. For offshore supply vessels the occupancy requirements in 46 CFR 127.280 (a)(1) and 46 CFR 127.280(b)(2)(i) apply. For Mobile Offshore Drilling Units (MODU) the requirements in 46 CFR 108.201 apply.

A. ACS may use the following standards to demonstrate an acceptable level of safety for the design and construction of PAM for installation on inspected and certificated vessels/facilities:
   - ABS Requirements for Portable Accommodation Modules (January 2025)
   - Equipment assemblies, DNVGL-ST-E272 (Aug 2024)

OR

B. PAM may be certified by the Coast Guard for installation on inspected and certificated vessels/facilities. The standards of reference (a) (ABS Requirements for Portable Accommodation Modules) combined with the following items are acceptable design and construction standards for PAM. Other design and construction standards providing a similar level of safety may be used upon approval by the Marine Safety Center.

   Structural fire protection:
   1. General (ABS Rules for PAM 2/5.1) – The Coast Guard accepts compliance with SOLAS Method IC using Coast Guard approved structural fire protection materials tested to the Fire Test Procedures (FTP) Code as equivalent to meeting the CFR requirements in Subpart 92.07 of Subchapters I for cargo ships and Subpart 32.57 of Subchapter D for tank ships. However, Coast Guard approved structural fire protection materials may not meet SOLAS requirements, depending on the host vessel. The design review should indicate whether the specific module is eligible for international service by providing guidance on whether the SOLAS notation should be applied.
   2. Owners of vessels/facilities intending to classify PAM spaces as low fire risk should ensure fire testing requirements for furnishings are met in accordance with reference (c) and applicable regulations.
   3. PAM should not contain interior or enclosed stairways.

   Construction:
   1. Insulating Materials (ABS Rules for PAM 2/7.3) – For PAM installed on a host vessel/facility which is required to meet SOLAS, low flame spread characteristics should be in accordance with the FTP Code. For PAM installed on a host vessel/facility which is not required to meet SOLAS, low flame spread characteristics may meet either the FTP Code or the applicable standards found in 46 CFR.

   Fire integrity:
   1. Fire Integrity of External Boundaries (ABS Rules for PAM 2/9.1) – Exterior boundaries should be steel or equivalent and have a minimum rating of A-0.

2. Fire Integrity of Internal Bulkheads (ABS Rules for PAM 2/9.3) – Spaces not listed in the ABS Rules for PAM should be in accordance with SOLAS II-2 Regulation 9 or applicable structural fire protection requirements for the certification subchapter(s) of the host vessel.
3. PAM intended to be installed on MODUs or production facilities, should meet the additional design requirements in Sections 2/13.3 and 2/13.5 of reference (a) as applicable.

Electrical:

1. Public Address (PA) (ABS Rules for PAM 2/15.5) – Loudspeakers should be located to eliminate feedback or other interference which would degrade communication, and they should not have external volume controls or local cutout switches.

2. General Alarm (GA) (ABS Rules for PAM 2/15.7) – Each general emergency alarm signal should be marked "GENERAL ALARM-WHEN EMERGENCY ALARM SOUNDS GO TO YOUR STATION" in red letters at least ½ inch high.

3. Emergency Lighting (ABS Rules for PAM 2/15.11) – Where emergency lighting is supplied by the host vessel/facility emergency power distribution system, the emergency lighting feeder should be separated as widely as practicable from any general lighting feeder supplying the PAM. Emergency lighting should provide illumination for the same period required for the host vessel/facility.

4. Refrigerated Spaces – Locked-in Alarm (ABS Rules for PAM 2/15.13) – The alarm activator should be in the refrigerated space at its exit. If there is a common audible signal for more than one lockable refrigerated space, there should be an annunciator for locating the space from which the signal was initiated.

5. Fire Detection and Alarm System (ABS Rules for PAM 2/15.15) – Each alarm annunciator, fire detector, test station, manual station, and vibrating bell should be approved under 46 CFR 161.002.

6. Ventilation (ABS Rules for PAM 2/15.17) – Each ventilation stop station should be marked and protected against accidental activation. The stop station should have a nameplate that identifies the systems controlled and the stop position of the switch clearly identified. The ventilation stop station should be arranged so that damage to the switch or cable automatically stops the equipment controlled.

7. Hazardous Areas (ABS Rules for PAM 2/15.19) – Electrical Installations on PAM installed in hazardous areas should comply with the applicable host vessel/facility regulations for hazardous locations. This includes, but is not limited to, industrial modules, such as mud logger rooms and ROV control rooms.

Plan Review Guidance

Coast Guard review of PAM are generally conducted against the standards in reference (a), and cites from reference (a) are provided here to assist Coast Guard personnel. ACS conducting PAM plan review are expected to complete their review to their appropriate standard.

A. Module Review. A complete plan review of the module will cover the following aspects:

1. Materials: Where required by the regulations, materials used in the construction of PAM must be Coast Guard approved. Certificate numbers for these materials should be clearly listed on the plans.

2. General Arrangement: Where required by the regulations, spaces inside PAM must be arranged using the standards that would be applied to similar integral spaces on a host vessel/facility. Plans should clearly show details of accommodation spaces (occupancy, floor area, lockers, etc.), means of escape, ventilation, etc.

3. Structure: All structures will generally be reviewed to the guidance provided in Section 2/23 of reference (a), with due consideration to the intended usage and service loads. Alternatively, submitters may submit calculations based on fundamental principles, or other recognized standards, to demonstrate capabilities of their proposed designs.

4. Structural Fire Protection (SFP): All exterior boundaries should have a minimum fire rating of A-0. To preclude any potential limitations on host vessel/facility applications, an A-60 exterior boundary is recommended. Reference (c) provides applicable requirements and guidelines. Plans should clearly indicate the fire rating of each boundary. Adequate levels of construction details should be shown to permit complete review.

5. Machinery and Electrical: All machinery and electrical systems should comply with the requirements specified in Sections 2 and 4 of reference (a) as well as items listed in enclosure (1) of this policy.

B. Installation Review. A complete plan review of the installation of PAM on a host vessel/facility will cover the following aspects:

1. General Arrangement: Plans should clearly show location on the host vessel/facility where the PAM will be installed, details of the accommodation spaces (sizes, occupancy, lockers, etc.), means of escape, guard rails, lifesaving and firefighting appliances, etc. Ventilation should be arranged so that intakes are widely separated from any exhaust or hazardous location.

2. Structure: The structural review of the installation will generally be in accordance with Section 4/9 and 4/13 of reference (a). Structural design based on other recognized standards, as well as first principles will be accepted, with due consideration to the intended usage as well as service loads.

3. Structural Fire Protection (SFP): All exterior boundaries must have a minimum fire rating of A-0. To preclude any potential limitations on host vessel/facility applications, an A-60 exterior boundary is recommended. The design standards in enclosure (1) of this policy letter, and reference (c) provide applicable requirements and guidelines. Plans should clearly indicate the fire rating of each boundary. Plans for PAM installations on MODUs or production facilities should demonstrate compliance with the requirements of 2/13.3 and 2/13.5 of reference (a) as applicable. Adequate levels of construction details should be shown to permit complete review.

4. Machinery and Electrical: All machinery and electrical system installations should comply with the requirements specified in Section 4 of reference (a) as well as items listed in paragraph enclosure (1) of this policy.

5. Stability: As required by the regulations, operators of the host vessel or facility must have an accurate account of the effects on stability due to installation of PAM. The operator may choose to account for the PAM as deck cargo in accordance with the approved stability letter. If this option is exercised, the weight and center of gravity of all modules, along with all appurtenances, should be verified to the satisfaction of the OCMI before installation. If the weight or center of gravity of the PAM or its appurtenances cannot be accurately determined, the entire installation will be considered part of lightship and addressed in accordance with reference (d). It should be noted that the number of additional personnel accommodated in the PAM may affect stability requirements, such as damage stability and survivability criteria, for the host vessel. For stability purposes, where actual VCG is not available, the PAM VCG should be assumed to be ½ its height.

6. Securing: Securing of the modules to the deck should be in accordance with the requirements of Section 4/11 of reference (a).

Inspection Guidance

The guidance in this enclosure is intended for OCMIs and marine inspectors. Procedures for initial fabrication, installation on a host vessel/facility, recurring inspections, and PAM maintenance/repair/alteration are outlined below.

A. Initial Fabrication. The initial fabrication of PAM shall be provided with the oversight necessary to ensure each module is fabricated, outfitted, and examined for compliance with approved engineering plans. The OCMI has the discretion to vary inspection oversight or perform spot checks as needed during the construction of several units under a single pre-approved plan based on unit workload and prior working relationship with fabricator.

1. An initial meeting with the Fabricator should be scheduled to address the expected timeline to delivery, and the expectations for fabrication and inspection (e.g., established call-outs).

2. The following are key inspection areas that should be targeted:
   a. Structure – scantlings, welding, dimensions, and testing
   b. Structural Fire Protection – material certificates, application, and verification
   c. Electrical – approved material, termination/attachment, alarm systems, and emergency lighting
   d. Piping – approved material, testing, and hotel service attachments
   e. Machinery – approved material, safe-guards, and installation
   f. Fire Safety – approved extinguisher installation, manual call points, and inspection of fixed extinguishing system if fitted
   g. Ventilation – verify closure
   h. Weight – certify module final weight
   i. Securing Arrangement – standards for attachment, ISO connection or D-ring
   j. Data Plate verification and stamping

B. Installation on Host Vessel/Facility.
1. An owner or operator that requests PAM installation should make notifications in accordance with the inspection regulations for the vessel/facility and paragraph 5.c.ii of this policy. The notification typically includes a full description (i.e. the placard information at minimum) of the PAM(s) to be installed and PAM identification by its issued Coast Guard number. This notification includes a General Arrangement drawing that identifies the proposed physical location of the PAM(s) aboard the vessel/facility as well as any nearby machinery, tanks, hazardous locations, etc. This drawing should identify each module when multiple units are to be installed, which should include any stacking arrangements.

2. An initial meeting should be held with the host owner/operator and classification society to plan the following considerations for inspection during installation and before operation:
   a. Expected timeline for installation
   b. Communicate responsibilities, expectations, and method of communication throughout installation
   c. Key inspection/survey attendance requirements

i. Location/arrangement of PAM as identified in approved plans
ii. Securing arrangement as identified in cargo securing manual or approved securing arrangement drawing
iii. Examination of all tie-in items (e.g. piping, electrical)
iv. Operational tests (e.g. alarms, public address system, fire safety systems)
v. Examination of escapes
vi. Examination of firefighting equipment
vii. Examination of lifesaving appliance installation (if needed)
viii. Examination of lifesaving equipment

3. To verify compliance with the integration standards listed in paragraph 5.c.iv of this policy, the marine inspector shall review approved plans to ensure proper placement of the PAM and connection to the vessel/facility systems. The supply circuit of the host vessel/facility should have sufficient capacity to safely handle the load of the PAM(s). The marine inspector should determine the acceptability of sanitary systems by comparing them to the host vessel/facility waste processing capabilities.

4. The Fire and Safety Plans required by host vessel/facility operations regulations should be updated to reflect the additional safety equipment associated with PAM installation, and be posted in a conspicuous location inside the PAM. The means of escape and muster stations shall be examined for compliance with host vessel/facility requirements, with special attention being given to multiple PAM installations.

5. To verify compliance with the stability standards listed in paragraph 5.c.v of this policy, the marine inspector shall confirm that the approved stability letter or booklet allows for changes resulting from PAM installation. The marine inspector should verify that the vessel Master has accounted for the PAM with regards to vessel stability. If the approved stability letter or booklet does not provide sufficient detail to evaluate the allowance of PAM, the stability approving organization should evaluate the impact of the PAM installation on vessel stability. The marine inspector shall be aware that addition and removal of PAM could have an impact on stability. If the marine inspector has questions, he or she should contact the Marine Safety Center or the ACS.

6. The marine inspector shall be aware that the addition and removal of PAM could have an impact on assigned vessel tonnages, per paragraph 5.a.iii of this policy. If the marine inspector has questions, he or she should contact the Marine Safety Center which administers the U.S. Tonnage Measurement Program.

7. The marine inspector shall verify that the PAM(s) are safely secured in accordance with the approved securing arrangement drawing, the host vessel Cargo Securing Manual, and/or Classification Rules, as applicable.

C. Recurring Inspections. When PAM are installed on a vessel/facility, examination of the following items is required during scheduled and in-service inspections:

1. Additional items specified on the Amended COI or Temporary COI
2. Ensure PAM is being utilized as intended
3. Visually examine the installation for wastage, damage, and alteration

4. Ensure that the installation meets all applicable requirements
5. Ensure adequacy of all emergency alarms, public address system, fire and safety equipment, and emergency lighting
6. Verify that all means of escape are clear and operable
7. Verify condition of all connections (e.g. wiring, piping, securing arrangements)
8. Carefully examine all exterior and interior portions to determine continued serviceability

Note: Recurring inspections are not required for PAM not installed on a host vessel/facility.

D. Maintenance, Repair, or Alteration.

1. All PAM(s) should be maintained in compliance with applicable regulations and standards. To accomplish this, PAM(s) will require routine maintenance both while installed and while not installed.

2. Any modification, alteration or repairs should be communicated to the cognizant OCMI in accordance with paragraph 5.b.v of this policy. The modification, alteration or repair should be approved prior to commencing any work. When the local OCMI deems necessary, these modifications, alterations and repairs shall be inspected by a marine inspector. If repairs are in kind, the original drawings submitted and approved should be provided to the attending marine inspector. Any test or inspection required by the marine inspector during this should be agreed upon and acceptability of these tests resides with the marine inspector.

3. PAM(s) installed for extended periods may suffer wastage. Maintenance needed to ensure habitability, structural integrity, and integrity of structural fire protection boundaries should be considered. Depending upon design and scantlings, allowable wastage may be reduced and shall be carefully considered. The utilization of approved non-destructive testing may be required in determining acceptability for continued use.

4. PAM(s) that require significant repairs shall be evaluated carefully to the approved plans. The alterations or replacement of furnishings can significantly impact that acceptability of the PAM(s) due to increased Fire Rating (see Sections 2.8 – 2.10 of reference (c)).

E. Existing PAM not in Compliance with this Policy.

1. All existing PAM installed on host vessels/facilities are authorized to remain in service until the OCMI deems them unserviceable.

2. Marine inspectors shall ensure that existing PAM installed on certificated vessels/facilities are documented in accordance with paragraph 5.d of this policy at the first scheduled inspection after publication of this policy.

3. Repairs or alterations made to existing PAM should be made in accordance with paragraph 5 of this policy.

Documentation Guidance

The guidance in this enclosure is intended solely for marine inspectors and Marine Safety Center engineers. Procedures for documenting Coast Guard Numbers, plan approvals, data placard, and PAM letters are outlined below.

A. Creating a Coast Guard (CG) Number. The process to generate a CG number within MISLE is the first step to identify a specific module that does not already exist. A CG number ensures that all records associated with PAM are tracked and stored in one location and also provides industry access via the U.S. Coast Guard Maritime Information Exchange (Port State Information Exchange). The following steps should be used to create PAM profile with a CG number:
   1. Navigate to the MISLE Homepage and log-in as normal.
   2. Navigate to MISLE Vessels function button.
   3. Select Vessel in the Navigation Pane to access Search Workflow.
   4. Fill in any field and then Search MISLE to ensure PAM does not already exist.
   5. Provided the Search yielded no results, select the "New" toolbar button to open the Create Vessel Workflow.
   6. Required Fields are identified with red asterisks' (*) and should be filled in to create the PAM. Both General Information and Identification Workflows have required information fields that must be populated.
   7. Select General Information Workflow: The identification (Name) should be clear and detailed. It is recommended that the PAM be identified by its dimensions (i.e. 40'x15'6"x10'), primary use (galley, berthing, office, recreation, lab, etc.), and manufacturer serial number.
   8. Identify the Flag State of the PAM. If the Flag is U.S., click the icon of the U.S. Flag.
   9. Class Type should be set as Miscellaneous Vessel.
   10. Type should be set as Living Quarters.
   11. Subtype should be set as General.
   12. Select Identifications Workflow: Select the Identification Type by activating the drop-down menu and select CG#. The CG Number will now be auto populated with <Auto Generated> which will select the next sequential number from the system.
   13. Select Add Identification button for MISLE to populate the CG Number
   14. No other fields need be populated to create the PAM in MISLE. Create the PAM by clicking the "Save" toolbar button.
   15. Record the Auto Generated CG# and proceed to Create Inspection Activity for the construction oversight of the PAM or to document the PAM in MISLE

B. Filing of Plan Approvals. All Plan Review documentation from the Marine Safety Center, Classification Societies, and OCMIs shall be entered, tracked, and managed in the MISLE Activity for the construction and installation of the PAM. These documents should be identified as permanent documents to ensure long-term tracking and compliance.

C. Data Placard. The data placard specified in paragraph 5.d.ii of this policy should contain the following information:
   1. Type (see primary use as determined in A.6 of this enclosure)
   2. Manufacturer serial number
   3. CG number

4. Approved use (D, I, I-A, L (<36 OSWs or >36 OSWs), SOLAS. Include all subchapters and international standards for which the PAM is approved. Example: "Approved for use on I, I-A, and SOLAS")
5. Gross Weight short tons
6. Volumetric Capacity cubic feet
7. Stacking allowance (Example: "Approved for stacking up to and including 3 high")
8. Electrical Load (normal/emergency)
9. Any issued restrictions
10. Allowance for hazardous location installation
11. Blast ratings if built to blast resistance criteria

D. Issuance of Documentation for PAM.

1. Acknowledgement of PAM Submission- The OCMI that receives proper notification from the designer, fabricator, or owner, shall issue a letter that identifies the PAM by Coast Guard number and expectations for documentation during plan review and inspection. Refer to Appendix A of this enclosure for an example of this initial letter.

2. Fabrication- After satisfactory fabrication oversight has been completed, the Coast Guard OCMI shall issue an approval letter to the PAM(s) owner. Refer to Appendix B of this enclosure for an example of this approval letter. The letter shall contain the following information:
   a. Identify the PAM Owner
   b. Identify each module by name and CG Number
   c. Identify allowable installation locations
   d. Reference all plan approval letters

3. Installation- Once the PAM(s) has been installed and examined, a Temporary Certification of Inspection (COI) or an Amendment to the COI shall be issued to the host vessel/facility. The Certificate shall include the following information:
   e. Identify the PAM(s) by Coast Guard number
   f. Any additional portable firefighting equipment
   g. Any additional lifesaving appliances
   h. Any additional personal lifesaving equipment
   i. Any limitations in route and operating conditions
   j. Any needed changes in manning (e.g. additional lifeboatmen needed to evacuate additional persons)

4. Recommended wording for COI/FOF COI Amendment –
   USCG APPROVED MODULES (insert CG#(s) of all units installed) INSTALLED (insert date). VESSEL STABILITY AND TONNAGE HAVE BEEN VERIFIED. ADDITIONAL LIFE SAVING AND FIREFIGHTING EQUIPMENT AND INSTALLATIONS SHALL REMAIN ONBOARD UNTIL PROPER REMOVAL OF THESE MODULES ARE VERIFIED BY AN ATTENDING MARINE INSPECTOR.

5. Recurring Inspections for Installed PAM- No documentation will be issued to PAM installed on host vessels/facilities. The PAM is considered as part of the vessel/facility, and inspection results are assigned to the host.

APPENDIX A

U.S. Department of Homeland Security
United States Coast Guard

Officer in Charge, Marine Inspection
By direction
United States Coast Guard
Unit Name

XXXXXXXXXXXX
XXXXXXXXXXXX
XXXXXXXXXXXX
Phone: *(XXX) XXX-XXXX*
Fax: *(XXX) XXX-XXXX*

16711
Date

PAM Designer/Fabricator/Owner
Attn: *POC Name*
Address

POC Name:

I am in receipt of your letter requesting Plan Review and Inspection of *XXXXXXXXXX (this should identify the Unit by the name assigned in MISLE)* be conducted in accordance with CG-ENG Policy Letter No. 01-16, Portable Accommodation Module Guidance.

To eliminate confusion on this project, please inform all parties submitting documentation, plans, plan review comments, and any other correspondence to use the module's Coast Guard Number (*CGXXXXXXX*). All correspondence submitted to Classification Society *(name the Class Society specifically)*, Coast Guard Marine Safety Center, *XXXXXXXXXX (identify any and all modules impacted)*, or any other Coast Guard office should reference this module by its Coast Guard Number. All correspondence regarding the design, fabrication, and inspection of this module shall be forwarded to this office for inclusion in the module's MISLE documentation record. Failure to comply may result in the delayed ability to utilize this module and cause the loss of critical historical information gained during the design, fabrication, and inspection of the unit.

If you have any questions concerning this matter, please contact *name of the Chief of Inspections with phone number and email* or *name of the attending Marine Inspector with phone number and email.*

Sincerely,

XXXXXXXXXXX
XXXXXXXXXXX
XXXXXXXXXXX
Officer in Charge, Marine Inspection
By direction

APPENDIX B

U.S. Department of Homeland Security

United States Coast Guard

Officer in Charge, Marine Inspection
By direction
United States Coast Guard
Unit Name

XXXXXXXXXXXX
XXXXXXXXXXXX
XXXXXXXXXXXX
Phone: *(XXX) XXX-XXXX*
Fax: *(XXX) XXX-XXXX*

16711
Date

Company Name
Attn: *POC Name*
Address

Subj: *PORTABLE ACCOMMODATION MODULE APPROVAL*
Name issued in MISLE, CG # (if more than 1 module, list all modules)
Installation on Vessels Certificated for 46 CFR Subchapters *I, I-A, L, and SOLAS*
Input Hazardous location allowance if any (e.g. Class I Division II Locations)

Ref: (a) *List each Marine Safety Center Plan Approval letter with serial number*

POC Name:

The subject module*(s)* was inspected to plans approved by the United States Coast Guard Marine Safety Center, references *(a) through (?)*. The module is approved for installation in *exposed/protected* locations.

Each module shall be capable of being integrated with the host vessel or facility systems (e,g. fire detection, general alarm, public address, electrical, and sanitary). All penetrations must maintain the structural integrity and fire protection rating of the module.

Additional plan approval is required for this module to be installed on a certificated vessel or facility. Plans for alterations to this module must be submitted to the cognizant Officer in Charge, Marine Inspection prior to carrying out the alterations.

Please retain this approval, in addition to the referenced plan approval letters as a part of your Portable Accommodation Module Record. If you have any questions concerning the approved module*(s)*, please contact *name of the Chief of Inspections with phone number and email* or *name of the attending Marine Inspector with phone number and email.*

Sincerely,

XXXXXXXXXXX
XXXXXXXXXXX
XXXXXXXXXXX
Officer in Charge, Marine Inspection
By direction