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CG-ENG Policy Letter
No. 01-16
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From:  B.J. Hawkins, CAPT
COMDT (CG-ENG)

To: Distribution

Subj: PORTABLE ACCOMMODATION MODULE (PAM) GUIDANCE

Ref: (a) American Bureau of Shipping (ABS) Guide for Portable Accommodation Modules (May 2014)
(b) COMDTINST 16000.7B Change 1, Marine Safety Manual, Volume II: Materiel Inspection
(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/facilities.
2. **DIRECTIVES AFFECTED.** This policy letter supersedes the use of the Eighth District Interim Recommended Practice for Plan Approval, Certification, and Installation of Accommodation Modules for use on Inspected Vessels (RP 98-01).
3. **ACTION.** Officers in Charge, Marine Inspection (OCMI) should verify that PAMs are reviewed, certified, and installed on inspected vessels/facilities in accordance with this policy. PAM fabricators, Authorized Classification Societies (ACS) and vessel/facility operators should refer to this policy to assist in the design, plan submission, and installation phases. ACSs should use this policy to review and approve the installation of PAMs on vessels enrolled in the ACP, for which the ACS is issuing the relevant SOLAS safety certificates. Supplements should be updated to reflect this policy, to conduct such work.
4. **BACKGROUND.**
 - a. The installation of PAMs on inspected vessels and facilities has become more prevalent with the evolution of Outer Continental Shelf (OCS) activities toward deeper waters. While modular units have been used in the offshore industry for many years with a satisfactory safety record, the expanding use of various modules leads to inconsistency among approving offices and introduces the risk of uncertified spaces on otherwise certificated vessels/facilities.

- b. Under the plan approval and inspection regulations of each certification subchapter in 46 CFR, the Coast Guard is responsible for the construction, arrangement, and equipment of spaces, of which PAMs are a portable version. The various host vessel/facility regulations apply to PAMs. Reference (a) provides a consolidated guide for design, construction, and installation requirements. To aid fabricators, vessel/facility operators, and marine inspectors, this policy allows for the PAM industry to utilize a consolidated set of standards and standardizes processes for Coast Guard oversight of PAM design, construction, and installation.
5. **POLICY.** The following guidance is provided to OCMI, PAM fabricators, ACSs, and vessel/facility operators in order to ensure the consistent application of standards for Portable Accommodation Modules.
- a. *Applicability.*
 - i. The guidance in this policy applies to PAMs that are installed on a host vessel/facility that is certificated by the Coast Guard. For the purpose of this policy, a PAM is 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. This includes sleeping cabins, offices, hospitals, recreational spaces, dining spaces, lavatories, galleys, laundries, laboratories, workshops, wireline units, mudlogger rooms, ROV control rooms, dive control rooms, and any other similar spaces.
 - ii. New PAMS (fabricated after the publication date of this policy) should comply with all of the guidance contained in this policy. Existing PAMs (fabricated or installed on a host vessel or facility prior to the publication of this policy) should comply with paragraphs 5.c (*Installation and Inspection*) and 5.d (*Documentation*) of this policy, but need not comply with paragraph 5.b (*Design and Construction*). Existing PAMs that were not Coast Guard approved prior to this policy should be reviewed by the cognizant OCMI, or ACS for ACP vessels, for compliance with this policy during routine inspections. For both new and existing PAMS, any alterations made to the structure or systems should comply with the design and construction standards listed in this policy.
 - iii. The guidance in this policy generally applies to PAMs that do not exceed length, width, and height dimensions of 46 x 16 x 10 ft, as described in the general applicability of Section 1/5 of reference (a). While this guidance can be used for PAMs 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.
 - b. *Design and Construction.*
 - i. Each 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, O, SOLAS.
 - ii. Each PAM should be fabricated to the design review standards listed in reference (a), hereby referred to as the ABS Guide. While the ABS Guide is voluntary for

industrial modules, all PAMs, as defined in this policy, should comply with the listed standards. PAMs built to the ABS Guide should also comply with the supplemental design standards listed in enclosure (1).

- iii. PAMs 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.
 - iv. Prior to beginning fabrication or alteration of a PAM, the PAM owner should submit an application 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), O, SOLAS). When multiple subchapters are applicable, the most stringent requirements should be applied.
 - v. For new fabrication of a non-classed PAM, construction engineering plans and specifications should be submitted to the Marine Safety Center for approval. If a PAM itself is to be classed, the OCMI may accept an ACS approval for plan review in lieu of Marine Safety Center approval. The ACS approval must be to the standards contained within this policy. Proposals for alterations to existing PAMs 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. Prior to installing a PAM on a non-ACP certificated vessel/facility, the operator should submit an application for inspection to the cognizant OCMI 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 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.
 - ii. Prior to installing a PAM on an ACP vessel/facility, the operator should notify the cognizant ACS 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 ACS for review and approval. Since the addition or removal of PAMs on vessels/facilities typically has manning implications, the ACS must notify the cognizant OCMI. 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, such as stability.
 - iii. 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.

- iv. Vessel/facility operators must have an accurate accounting of the stability changes that result from the addition of PAMs. It is important to note that an increase in the number of personnel onboard the 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. The marine inspector should be aware that the addition and removal of PAMs could have an impact on stability. If the OCMI believes that vessel stability is in doubt, they should contact the Marine Safety Center.
 - v. For tonnage measurement purposes, PAMs are portable enclosed spaces (also referred to as temporary deck equipment), and their volumes are subject to inclusion in tonnage. Information on tonnage measurement treatment of such spaces, including provisions for volumetric allowances for PAMs on tonnage certificates, can be found in references (b), (c) and (d). Per 46 CFR 69, the vessel owner is responsible for contacting an authorized measurement organization for a remeasurement determination 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.
 - vi. For removal of a PAM from a non-ACP certificated vessel/facility, the operator should submit an application for inspection to the cognizant OCMI clearly stating the purpose. Additionally, the 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. For removal of a PAM from an ACP vessel/facility, the operator should notify the cognizant ACS clearly stating the purpose. The ACS must notify the cognizant OCMI for attendance purposes to modify and review all issued certificates.
 - viii. Inspection of PAMs should be carried out in accordance with the guidance outlined in enclosure (3).
- d. *Documentation.*
- i. Each PAM is 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.

- ii. Each PAM should have a placard permanently attached to the module listing approval specifications. Refer to enclosure (4) for additional guidance on documenting PAMS.

 - iii. The owner should maintain, for each PAM, a PAM Record that contains all documents pertaining to the design and use of the module. 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)

 - iv. 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.

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Enclosure: (1) Supplemental 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

Supplemental Design Standards

The ABS Guide for Portable Accommodation Modules (May 2014), as supplemented below, demonstrates an acceptable level of safety for the design and construction of PAMs for installation on inspected vessels/facilities.

- A. The following occupancy limitation applies:
1. Berthing spaces should 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 applies.
- B. The following supplemental structural fire protection requirement applies:
1. General (ABS Guide 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. 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.
 2. In cases where a non-ACP vessel is subject to the domestic structural fire protection regulations as well as SOLAS chapter II-2, the applicable criteria are determined based on the type of vessel being considered.
 3. PAMs should not contain stairways.
- C. The following supplemental materials of construction requirement applies:
1. Insulating Materials (ABS Guide 2/7.3) - For PAMs 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 PAMs 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.
- D. The following supplemental fire integrity requirements apply:
1. Fire Integrity of External Boundaries (ABS Guide 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 Guide 2/9.3) – Spaces not listed in the ABS Guide 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. PAMs 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.
- E. The following supplemental electrical requirements apply:

1. Public Address (PA) (ABS Guide 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 Guide 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 Guide 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 Guide 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 Guide 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 Guide 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 Guide 2/15.19) – Electrical Installations on PAMs 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 mudlogger rooms and ROV control rooms.

Plan Review Guidance

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

1. **Materials:** Where required by the regulations, all materials used in the construction of PAMs 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 a 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 supplemental requirements listed in enclosure (1) of this policy.
6. **Classed Modules:** Owners of PAMs that will be classed by an Authorized Classification Society should use this Module Review guidance to pursue OCMI acceptance in lieu of MSC approval, during plan review.

B. Installation Review. A complete plan review of the installation of a 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, life saving and fire fighting 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. Reference (a), as modified by 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 supplemental requirements listed in paragraph 5.b of this policy.
5. **Stability:** As required by the regulations, operators of the host vessel or facility must have an accurate account of the affects on stability due to installation of PAMs. The operator may choose to account for the PAMs 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 PAMs 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 PAMs 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 $\frac{1}{2}$ 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).
7. **Authorized Classification Societies** should use this installation review guidance to review and approve the installation of PAMs on vessels enrolled in the Alternate Compliance Program, for which the Authorized Classification Society is issuing the relevant SOLAS safety certificates.

Inspection Guidance

The guidance in this enclosure is intended for OCMI's, marine inspectors, and ACS surveyors. 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 each PAM shall be provided with the oversight necessary to ensure the PAM 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 and/or ACS surveyor 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 shall make notifications in accordance with the inspection regulations for the vessel/facility and paragraph 5.c.i 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 PAM 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:
 - 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.iii 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.iv 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 PAMs 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 addition and removal of PAMs could have an impact on assigned vessel tonnages, per paragraph 5.c.v 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, the ABS Guide and/or Classification Rules, as applicable.
- C. Recurring Inspections. When a PAM is 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 PAMs 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.iv 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 PAMs not in Compliance with this Policy.

1. All existing PAMs installed on host vessels/facilities are authorized to remain in service until a marine inspector deems them unserviceable.
2. Marine inspectors shall ensure that existing PAMs 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 PAMs should be made in accordance with paragraphs 5.b through 5.d 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 PAM that does not already exist. A CG number ensures that all records associated with a 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 a 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 OCMI’s 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), O, 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 office 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(s) Owner
 - b. Identify each PAM 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 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 PAMs- No documentation will be issued to PAMs 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



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 XXXXXXXXXXXX (*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 (CGXXXXXXXX). All correspondence submitted to Classification Society (*name the Class Society specifically*), Coast Guard Marine Safety Center, XXXXXXXXXXXX (*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,

XXXXXXXXXXXX
XXXXXXXXXXXX
XXXXXXXXXXXX
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

XXXXXXXXXXXXX
XXXXXXXXXXXXX
XXXXXXXXXXXXX
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,

XXXXXXXXXXXXX
XXXXXXXXXXXXX
XXXXXXXXXXXXX
Officer in Charge, Marine Inspection
By direction