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From: Commander, Eighth Coast Guard District

To: Distribution

Subj: ACCEPTING CLASSIFICATION SOCIETY EXAMINATIONS OF SELECTED MOBILE OFFSHORE DRILLING UNIT STRUCTURES

Ref: (a) CCGD8 SOP, Chapter 14, Confined Space Entry Policy

- 1. Eighth District Officers in Charge, Marine Inspection (OCMIs) are authorized to accept American Bureau of Shipping (ABS) and other recognized classification society inspections of the internal structural condition of spud cans and mat tanks during special examinations in lieu of drydocking (SEILODD) for independent leg and mat supported jack up, mobile offshore drilling units (MODUs). This policy applies to U.S. flag MODUs operating within the Eighth District's domestic and foreign inspection AORs.
- 2. Spud can and mat tank internal structural examinations are some of the most hazardous activities we require of our marine inspectors. Decay of residual organic matter in these spaces has the potential to create oxygen (O2) deficient atmospheres and/or toxic hydrogen sulfide gas (H2S). For these reasons, reference (a) requires MODU leg can and mat tank spaces to be tested for the presence of H2S and O2 by a National Fire Protection Association certified marine chemist or an industrial hygienist prior to entry by Coast Guard personnel.
- 3. During SEILODD inspections, Coast Guard marine inspectors should continue to carefully examine the external surfaces of MODU spud cans and mat tanks, particularly in high stress areas around critical leg joint connections. When external examination or the classification society's internal inspection indicates a condition that requires entry into a mat tank or spud can by Coast Guard personnel, the space shall be certified safe for entry by a marine chemist or industrial hygienist.

4. My POC for this matter is LCDR W. H. Daughdrill.

J. W. CALHOUN

By direction

Dist: All Eighth District Gulf Region MSOs, MSU and MSDs

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