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16711/LIFTBOAT 9 October 1998

From: Commander, Eighth Coast Guard District To: Distribution

Subj: PERSONS ALLOWED ON LIFTBOATS

Ref: (a) NVIC 8-91, enclosure 3 (b) 46 CFR 126.170

1. **Discussion:** Reference (a) provided guidance regarding persons allowed on a liftboat while elevated at an offshore work site. In general, this policy allowed liftboats, while elevated, to carry individuals in addition to those crew and persons in addition to the crew (PACs) identified on the vessel's Certificate of Inspection (COI), provided the vessel had adequate berthing arrangements and lifesaving equipment to accommodate everyone on board. Reference (b) allows an offshore supply vessel (OSV) to carry up to 36 "offshore workers" provided the vessel complies with the applicable provisions of 46 CFR Subchapter L. Recently, the offshore marine industry requested guidance on the continued applicability of reference (a) to new and existing liftboats subsequent to the changes in persons allowed criteria established by publication of 46 CFR Subchapter L.

2. Policy Relating to Accommodations (Berthing) Aboard Liftboats:

For purposes of this policy a new liftboat has the same meaning as a "new offshore supply vessel" described in 46 CFR Part 125. An existing liftboat is one that does not meet the definition of a "new offshore supply vessel" and has not undergone a major conversion that was initiated on or after March 15, 1996.

a. Limitations on Individuals Accommodated (Berthed) on New Liftboats:

New liftboats built to the provisions of 46 CFR Subchapter L are limited by 46 CFR 126.170 to the carriage of a maximum of 36 "offshore workers". Although limited to not more than 36, the actual number of "offshore workers" may be restricted further by the liftboat's design or configuration. The actual number of offshore workers allowed is specified on the vessel's Certificate of Inspection (COI). Thus, the maximum number of persons who may be accommodated (berthed) on board a new liftboat is *the crew plus 36 or fewer offshore workers specified on the vessel's COI*. This limitation on accommodations (berthing) applies equally whether the liftboat is underway or elevated. Adequate primary lifesaving equipment is assumed.

b. Limitations on Individuals Accommodated (Berthed) on Existing Liftboats:

The guidance contained in the section titled "Persons Allowed" found on page 6 of enclosure 3 to reference (a) remains applicable to existing liftboats. In essence, this guidance allows OCMIs to authorize existing liftboats, **while elevated**, to carry additional "offshore workers" provided there are adequate accommodations (berthing) and lifesaving equipment. The carriage of these additional personnel is recognized by the OCMI via an endorsement on the vessel's COI. The guidance in reference (a) on this matter does not provide an upper limit for these additional offshore workers. *Eighth District OCMIs shall continue to accept the arrangements and berthing accommodations on existing certificated liftboats. However, any modification of an existing liftboat to provide accommodations (berthing) for more than 36 offshore workers should not be approved by any Eighth District OCMI. Any such request should be referred to the Commanding Officer, Marine Safety Center for resolution. A sample COI endorsement reflecting this situation is provided below:*

Sample COI endorsement for existing liftboats inspected under NVIC 8-91:

WHILE ELEVATED, THE VESSEL MAY CARRY ()¹ ADDITIONAL PERSONS PROVIDED THEY ARE REMOVED PRIOR TO JACKING THE VESSEL INTO THE WATER AND NOT MORE THAN () TOTAL PERSONS ARE ON BOARD.

3. Policy Relating to "Transient Workers" on New and Existing Liftboats:

Recently several liftboat operators requested guidance regarding "transient workers" aboard their vessels. The operators reported that there is frequently a need to have offshore workers from an adjacent platform or Mobile Offshore Drilling Unit come aboard the elevated liftboat to consult on well completion, maintenance and workover issues, provide short term labor for a specialized industrial processes or eat in the liftboat's galley. Transient workers are not berthed aboard the liftboat. *Offshore workers or "transient workers" in excess of the personnel specified on the liftboat's COI may be allowed on board an elevated liftboat as long as <u>all</u> of the following conditions are satisfied:*

- a. The liftboat is elevated adjacent to a fixed offshore facility with sufficient deck area to act as a refuge for all persons from the liftboat in the event of an onboard emergency,
- b. There is a suitable gangway installed that provides unencumbered access and egress between the liftboat and the fixed offshore facility. The gangway should be at least 36" in width and have all necessary safety rails installed,
- c. There is a sufficient quantity of primary lifesaving equipment on board the liftboat for everyone on board. This includes a personal flotation device and adequate capacity in

¹Based on lifesaving provisions on vessel and the availability of berths beyond that needed for the crew and PACs authorized in the manning section of COI; may not exceed 36 berths for non-crew.

the lifefloats, liferafts, or lifeboats (as specified on the vessel's COI) to accommodate all personnel on board the liftboat at any given time,

- d. The weight of the transient workers should be accounted for by the vessel master as deck load when calculating the maximum amount of allowable deck cargo (as specified in the liftboat's approved operating manual).
- e. The liftboat's COI is endorsed by the cognizant OCMI to reflect the maximum number of persons allowed on board while elevated adjacent to a fixed offshore facility. The OCMI may base this number of additional "transient workers" on available deck space or other appropriate criteria. However, at no time should this maximum number of persons exceed an additional 100% of the total persons (crew + PACs/offshore workers) allowed by the vessel's COI.
- f. Liftboat COIs shall be endorsed to reflect the number of persons allowed while elevated in the following manner:

Sample COI endorsement for new and existing liftboats:

WHILE ELEVATED ADJACENT TO AN OFFSHORE STRUCTURE, THE VESSEL MAY CARRY __()² TRANSIENT WORKERS PROVIDED THEY REMAIN ON BOARD NO MORE THAN TWELVE (12) HOURS IN ANY TWENTY-FOUR (24) HOUR PERIOD AND NOT MORE THAN __() TOTAL PERSONS ARE ON BOARD. TRANSIENT WORKERS MAY NOT BE BERTHED ON BOARD. ALL TRANSIENT WORKERS SHALL BE REMOVED PRIOR TO JACKING THE VESSEL INTO THE WATER.

4. Questions regarding this policy may be directed to Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6271.

C. T. DESMONE By direction

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

Copy: Commandant (G-MSO), (G-MOC), (G-MSE) Marine Safety Center

² Based on lifesaving provisions on vessel: transients not to exceed total of crew + PACs/Offshore workers noted in manning section of COI. For instance, if a COI reflected a total of 5 crew and 16 PACs (21 total), an additional 21 "transient workers" could be allowed on board the elevated liftboat bringing the maximum total persons allowed to not more than 42.