



16711/RESCUE BOATS

AUG 25 1999

Mr. Christopher S. O'Sullivan, Jr.  
Vice President  
Offshore Marine Service Association  
990 N. Corporate Dr., Suite 210  
Harahan, LA 70123

Dear Mr. O'Sullivan:

This responds to your letter of April 6, 1999 concerning requirements for rescue boats on liftboat-style offshore supply vessels (OSVs). We appreciated the opportunity to discuss this matter with you and your association's members at our meeting on March 3<sup>rd</sup>. The meeting demonstrated the difficulty in applying the requirements of our recent rescue boat policy letter to unique vessels like liftboats.

The intent of the Eighth District's November 12, 1998 policy letter was to establish a reasonable standard for workboats being substituted for approved rescue boats on OSVs. The Coast Guard and many offshore vessel operators generally agreed that some OSVs carried small, unstable, oar-propelled workboats that were clearly unsuitable for their intended purpose as a rescue boat. Our policy letter established a performance standard for workboats being substituted for rescue boats. If existing workboats can meet that standard, they may be retained. Those that cannot are considered "unsuitable" and must be replaced.

Our rescue boat policy letter states that workboats with sufficient buoyancy and stability equipped with outboard engines in the 25-30 horsepower range have been found to be adequate rescue boats. We have not mandated that a workboat serving as a substitute to an approved rescue boat must have a minimum 25 horsepower engine in all circumstances. Some rescue boats may perform satisfactorily with outboard engines as small as 15 horsepower. We do not, however, foresee accepting workboats with engines less than 15 horsepower.

I agree that liftboats and other OSVs operating in protected waters (lakes, bays and sounds routes only) should not have to comply with the requirements of our rescue boat policy letter. However, they must still carry a rescue boat which meets 46 CFR 160.056. I will advise Eighth District OCMI's of my determination in this matter by separate correspondence.

Liftboats may use properly sized cranes to launch and recover rescue boats while the vessels are in the *elevated mode*. Any proposed use of an installed crane to launch and recover rescue boats while *afloat* would be subject to review by the Coast Guard Marine Safety Center (MSC) on a

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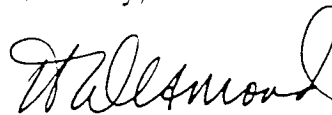
case by case basis. In the event that a proposal is approved to use the crane while in the afloat mode, we would expect MSC to require amendments to the vessel's Operations Manual to reflect the circumstances under which the vessel's crane could be used while afloat.

Some liftboats are highly maneuverable and may qualify to act as their own "rescue platform" while in the afloat mode. A liftboat may serve as its own rescue platform while in the afloat mode provided that the vessel can satisfactorily demonstrate that it can locate, adequately maneuver, and recover a helpless person from the water. This would have to be demonstrated to the satisfaction of the cognizant Officer in Charge Marine Inspection (OCMI).

Existing rescue boats which do not meet the operational standards set forth in our rescue boat policy letter must be replaced with an acceptable rescue boat within a reasonable timeframe. I concur with your recommendation that existing liftboats that do not have an approved rescue boat or suitable workboat substitute installed must complete such an installation by January 1, 2000 or at the next inspection for certification or reinspection, whichever is later. I will ask Eighth District OCMI's to extend current CG-835 deficiencies accordingly.

Please contact Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6193 should you have any questions or wish to discuss this matter further.

Sincerely,



C. T. DESMOND  
Captain, U.S. Coast Guard  
Chief, Marine Safety Division  
By direction

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