




16703
D8(do) Policy Letter 01-2022
Revision 1
February 26, 2024

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From: M. J. Denning, CAPT
D8 OCS OCMI

To: Distribution

Subj: VERIFICATION OF TRAINING AND DRILLS FOR PERSONNEL ASSIGNED
SPECIAL OR EMERGENCY DUTIES ON FLOATING OUTER CONTINENTAL
SHELF (OCS) FACILITIES (FOFs)

Ref: (a) CG-OES Policy Letter 01-22 Determination of Whether a Floating Outer Continental
Shelf Facility (FOF) is a Vessel
(b) CG-MMC Policy Letter 01-22 Merchant Mariner Credential Endorsements for
Service on FOFs
(c) CG-CVC Work Instruction 033(1) Non-Vessel Floating OCS Facilities (FOF) -
Compliance Requirements.
(d) Title 33 Code of Federal Regulations (CFR) Chapter I, Subchapter N

1. PURPOSE. This policy letter provides guidance for the verification of training for, and drills conducted by, personnel assigned special or emergency duties in the FOF's muster list or roles under the Emergency Evacuation Plan (EEP).
2. ACTION. Personnel conducting inspections on behalf of the District Eight OCS Officer in Charge, Marine Inspection (D8 OCS OCMI) shall comply with this policy.
3. DIRECTIVES AFFECTED. None. D8(m) Policy Ltr 03-2000, CH-1, Policy on Manning of Non-Self Propelled Floating Outer Continental Shelf (OCS) Facilities, was canceled by the original issuance of this policy letter on May 3, 2022.
4. BACKGROUND.
 - a. Historically, the Coast Guard had issued FOFs the traditional Certificate of Inspection (COI), CG-841, on which the OCMI prescribed an appropriate level of manning to ensure the facility could be operated safely during routine and emergency conditions. These manning requirements were similar to the manning required for a conventional non-self propelled Mobile Offshore Drilling Unit on location, and included requirements for personnel to hold a Merchant Mariner Credential (MMC) to serve as Offshore Installation Manager (OIM), Barge Supervisor (BS), and Ballast Control Operator (BCO).

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- b. On February 4, 2022, the Coast Guard Office of Operating and Environmental Standards (CG-OES) issued reference (a), which provides guidance to OCMI for determining whether an FOF is a vessel. For each FOF determined not to be a vessel, reference (a) instructs the OCMI to issue an FOF-specific COI letter rather than a traditional COI (i.e. Form CG-841).
- c. Also on February 4, 2022, the Coast Guard Office of Merchant Mariner Credentialing (CG-MMC) issued reference (b), which advises that the Coast Guard will no longer issue original MMC officer endorsements that are restricted to service on FOFs, but will continue to renew certain previously issued endorsements.
- d. On July 7, 2023, the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) issued reference (c), which provides policy to OCMI for the inspection of FOFs deemed not to be vessels, and states that it is imperative that the marine inspector verify that the Person in Charge (PIC) is ensuring that personnel are familiar with their assigned duties and that drills are conducted at the required frequency.

5. POLICY.

- a. As a result of the policy changes outlined in references (a) and (b), personnel serving on FOFs will no longer be required to hold MMCs, and the D8 OCS OCMI will no longer prescribe manning requirements on FOF COIs.
- b. Coast Guard regulations in reference (d) require personnel assigned special or emergency duties on an FOF to be trained in those duties. These requirements include, but are not limited to, the following:
 - i. 33 CFR 146.5 requires the owner or operator to designate by title and in order of succession the persons onboard each OCS facility who shall be the “Person in Charge” (PIC).
 - ii. 33 CFR 146.115 requires the PIC on a manned OCS facility to assign special duties and duty stations to each person so that in the event an emergency arises confusion will be minimized, and no delay will occur with respect to the use or application of required equipment.
 - iii. 33 CFR 143.120(b) requires that each FOF comply with the requirements of 46 CFR 108. 46 CFR 108.901 contains requirements for preparing, posting, and maintaining a muster list and emergency instructions. The muster list must specify the duties assigned to various personnel in the event of an emergency on the FOF. Note that personnel assigned to FOFs often refer to the muster list as a station bill; however, 33 CFR 146.130 is not applicable to FOFs.

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- iv. 33 CFR 146.125(a) and (b) require the PIC to conduct emergency drills at least once each month as though an actual emergency existed, and to instruct personnel as necessary to insure that all persons are familiar with their duties and stations.
 - v. 33 CFR 146.140 requires the operator of each manned OCS facility to develop an Emergency Evacuation Plan (EEP), establishes minimum requirements for those plans, requires the operator to ensure that all personnel specified in the EEP are trained in fulfilling their role under the EEP, and requires the operator to ensure that emergency evacuation drills are conducted in accordance with 33 CFR 146.125(c).
 - vi. 33 CFR 143.120 outlines certain requirements for FOFs, including (1) submission of plans and information listed in Subpart C of 46 CFR Part 107 prior to beginning construction, and (2) compliance with 46 CFR Part 108 (Design and Equipment). Per 46 CFR 107.305(q) and 46 CFR 108.301, FOFs are required to submit plans and information and meet the requirements of 46 CFR Subchapter S (Stability). Per Subpart D of 46 CFR Part 170, stability instructions must be available for operating personnel, and this requirement may be satisfied by either an operating manual or a stability booklet. Note that personnel assigned to FOFs often refer to the Operating Manual as the Marine Operating Manual (MOM).
 - c. It is the responsibility of the operator and the PIC to ensure that all personnel are familiar with their special or emergency duties and stations, and that they have been trained in fulfilling their assigned roles. Evidence to satisfy this requirement may include a course completion certificate issued in accordance with a recognized industry standard, proper documentation indicating satisfactory completion of appropriate training provided by the operator, an appropriate MMC issued by the Coast Guard held by personnel on a voluntary basis, or any other method acceptable to the D8 OCS OCMI.
 - d. When completing an inspection on an FOF in accordance with 33 CFR 140.101, OCS marine inspectors (MIs) will verify that personnel assigned special or emergency duties are familiar with those duties, and that personnel specified in the EEP are trained in fulfilling their role under the EEP. This verification may include reviewing the documentation discussed in paragraph 5.c., conversations with personnel, reviewing records of previously completed drills, observing one or more emergency drills, or reviewing or observing any other tests and procedures. If the attending MI has any concern(s) regarding the ability of personnel to perform their assigned duties or specified roles, then the MI will immediately report the concern(s) to the D8 OCS OCMI staff. When determining appropriate follow-on actions, the D8 OCS OCMI may consult with interagency partners as necessary.
6. FORMS/REPORTS: None
7. QUESTIONS. Questions regarding this policy may be directed to Deputy D8 OCS OCMI at (504) 671-2106.

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8. DISTRIBUTION.

- a. Eighth District units tasked with conducting inspections of behalf of the D8 OCS OCMI.
- b. Internet release authorized.

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