



15613

November 12, 1998

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: RESCUE BOAT REQUIREMENTS ON OFFSHORE SUPPLY VESSELS

1. PURPOSE:

a. This letter distributes policy regarding the enforcement of regulations requiring rescue boats on new and existing offshore supply vessels. It is not the intent of this policy that all existing flat-bottom rescue boats be immediately removed from service. It does, however, provide options for those vessels whose rescue boats are determined to be inadequate.

2. DISCUSSION:

a. Regulations requiring rescue boats on Offshore Supply Vessels (OSVs) have been in effect for many years. While the Coast Guard has allowed the use of oar propelled flat-bottomed boats for rescue boats on OSVs, it has generally been the opinion of many marine inspectors that these vessels were not adequate for their intended use. Recent promulgation of 46 CFR 133 required the use of more seaworthy SOLAS approved craft on new vessels and provided the mechanism for replacement of inadequate rescue boats on previously certificated OSVs when replacement of existing rescue boats is necessary (46 CFR 133.10 (c)). Appeals of OCMI decisions requiring replacement of existing units, and completion of a recent Quality Action Team looking into Eighth District policies regarding rescue boats, have been the catalyst for the development of this policy.

b. 46 CFR 133 is clear regarding the rescue boat requirements for new vessels. It allows the substitution of a workboat in place of a required SOLAS approved rescue boat. Enforcement problems encountered to date have dealt mainly with the inspection of existing vessels and in determining what constitutes a suitable replacement workboat. A recent appeal argued that an existing flat-bottom, oar propelled rescue craft should be replaced in-kind since it was being replaced due to normal wear and tear. The appellant referred to 46 CFR 108.515(b)(1) and (2) which allows in-kind replacement of survival craft on Mobile Offshore Drilling Units to avoid installing new davit systems for a newer style craft. While the replacement of a flat-bottom rescue boat was ruled to be different from the replacement of a Coast Guard approved survival craft which has an approved winch and davits, space and weight limitations on OSVs make acceptance of other alternatives appropriate. This policy provides guidance to evaluate the suitability of

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alternative workboats. In all cases, we must ensure that the overall goal of protecting life at sea is accomplished while considering any change to existing rescue boat arrangements.

c. An OCMI's decision to replace an existing rescue craft need not be based solely upon a determination that the craft is no longer serviceable. If the **adequacy** of an existing, but serviceable, rescue boat is in question, demonstration of its suitability by a performance test should be required. If the result of this test indicates that the craft is not suitable for its intended purpose, a requirement to replace it with a more suitable craft should be issued. This policy also provides guidance for conducting this performance test.

d. Finally, 46 CFR 133.135 allows certain OSVs to operate without a rescue boat as long as they qualify as their own rescue platform. This policy provides criteria to evaluate the adequacy of a vessel to serve as a rescue platform and an option for vessels that are regularly constrained in their ability to maneuver due to activities such as anchor handling and towing. While 46 CFR 133.135 restricts this option to vessels operating solely on "the outer continental shelf of the United States", a recent appeal resulted in a Commandant interpretation that any vessel which is not required to carry SOLAS certificates may use a rescue platform in lieu of a rescue boat.

e. A U.S. flagged OSV under 500 gross tons may operate in foreign waters without having to meet SOLAS. If it carries more than 12 passengers (Persons in Addition to Crew or Offshore Workers) it is a passenger vessel, but may operate without SOLAS certificates only if it does not engage in international voyages (i.e. from one country signatory to SOLAS to a port outside that country.) This policy provides guidance for evaluating a vessel's suitability to serve as its own rescue platform **only** if the vessel is not required to meet SOLAS

3. ACTION:

a. When a vessel's rescue boat is determined to be inadequate for its intended purpose, a requirement (CG-835) to correct the discrepancy shall be issued. Most **existing** OSVs will have three options available to correct this deficiency. First, the owner may install a rescue boat approved under the 46 CFR approval series 160.156 with appropriate launching apparatus. Second, they may install a suitable workboat, and third, they may seek qualification as a rescue platform. All of these options are discussed in greater detail below.

(1) RESCUE BOAT APPROVED UNDER 46 CFR APPROVAL SERIES

160.156 - These are SOLAS approved rescue boats and a launching/recovery system that meets 46 CFR 133.160.

(2) SUITABLE WORKBOAT: A suitable workboat shall meet the following:

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- (a) Capable of being launched within five minutes.
- (b) Sufficient seaworthiness (i.e. adequate positive buoyancy, stability, freeboard and/or deck coverage) to allow for maneuvering in a disturbed seaway with at least a three person complement. Although "disturbed seaway" is not defined, it is envisioned to include typical sea conditions as opposed to calm waters.
- (c) Adequate room for at least a two person crew with room for a third person lying down.
- (d) Capable of marshalling and towing inflatable liferafts (or lifeboats if the vessel is so equipped) loaded with their full complement of equipment and persons.
- (e) Can be used to recover a helpless person from the water.
- (f) Can effect the recovery of a helpless person and return that individual to the parent vessel within fifteen minutes.
- (g) If freeboard constraints do not allow for proper launching and loading from the main deck, the workboat shall be equipped with a launching/recovery system that meets the following:
 - 1. Located such that the stowed vessel can be quickly launched and will swing clear of all rigging, stacks, structures and overboard discharges
 - 2. The davit and winch structural members shall have a design safety factor of 4.5 times the Maximum Working Load (MWL). MWL includes the total of the weight of the boat, personnel¹, and boat equipment.
 - 3. The falls, suspension chains, links and blocks (as applicable) shall have a design safety factor of 6 times the MWL.
 - 4. The davit shall be fitted with an electric/hydraulic or hand powered winch and shall be capable of raising and lowering the workboat at MWL.

¹ The weight of personnel (2 crew plus 1 recovered person @ 165lbs/person) may be excluded from MWL only if the vessel is equipped to safely embark/disembark these persons while the workboat is in the water and only if the embarkation point is not more than 14.75 feet above the waterline of the vessel in its light condition

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5. If electric/hydraulic powered, the davit winch shall be fitted with automatic cut-off devices in accordance with SOLAS Chapter III, Section VI.
6. Each winch shall be designed to allow for lowering under the force of gravity or independent stored power.
7. Each winch shall be fitted with a brake to control the rate of lowering to approximately 0.5 meters per second.

(h) There are no firm rules on which boats may adequately serve as a workboat substitute for a rescue boat. However, experience has shown that the buoyancy and stability of rigid hull inflatables, or inflatable boats with reserve buoyancy, deep "V" hull and double "V" hull boats are all suitable candidates for this service. Additionally, boats with outboard engines in the 25-30 horsepower range have been determined to be adequate for this service.

(3) **RESCUE PLATFORM:** As stated above, the option of operating as its own rescue platform is available to many vessels. The following guidance provides a standard methodology for evaluating the suitability of a vessel to act as its own rescue platform.

(a) While 46 CFR 133.135 states that the vessel qualifying as a rescue platform must be arranged such that the rescue can be observed from the navigating bridge, this is an impossibility for most vessels as they come alongside the distressed person. Therefore, vessels with an efficient and reliable method for providing two way communication between a person at the side of the vessel (most likely at the recovery station) and the person at the helm, may be considered equivalent to this requirement 46 CFR 133.135. To qualify as a rescue platform, a vessel shall demonstrate that it has the equipment and trained crew to effect the recovery of a helpless person within fifteen minutes. Although there is no one set of proscriptive requirements that are necessary to meet the above standard, experience has shown that the following elements are essential components of a vessel qualifying as a rescue platform:

(b) As discussed above, the vessel must have an effective two-way communication system between the person at the rescue station and the person on the helm.

(c) Each member of the crew must be trained in his or her duties during a man overboard situation. Because there is no way to foresee who will go

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overboard, there must be sufficient cross training to provide for all contingencies.

(d) The vessel must have a system to recover a helpless person from the water while minimizing injury to that individual. While there is no one system that can be used to accomplish this recovery, recent innovations have provided effective methods of accomplishing this task. To provide for all contingencies, equipment used to effect the recovery should be provided at each side of the vessel or must be easily and quickly transferable to a recovery station at either side of the vessel. In addition to the recovery equipment, training and planning regarding the procedures to position a helpless person in the recovery apparatus must be planned and practiced.

(e) 46 CFR 133.135 allows an OSV to act as its own rescue platform when it is not "regularly" restricted in its ability to maneuver. Vessels that are "regularly" restricted in their ability to maneuver due to towing or anchor handling operations, may at the discretion of the OCMI, rely upon the rescue boat on the attended vessel to satisfy its rescue needs. To qualify for this provision, the vessel must prove to the OCMI that the rescue boat on the attended vessel meets all the above requirements for a rescue boat and that it is sufficiently manned at all hours of the day to effect a timely rescue.

b. Whether relying on a rescue boat, workboat or rescue platform, the key to a vessel's success at effecting a satisfactory rescue lies in crew training. The successful implementation of the above policies will hinge upon the Coast Guard's ability to evaluate crew training and effectiveness during man overboard drills.



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