

MEMORANDUM

Officer in Charge, Marine Inspection United States Coast Guard Marine Safety Unit Morgan City

800 David Drive, Rm. 232 Morgan City, LA 70380-1304 Phone: (985) 380-5350 Fax: (985) 380-5329

16711 M-13018 March 27, 2013 Macled 03-27-13

Reply to Attn of:

P. M. McMANUS, CDR MSU Morgan City

To:

From: /

COMDT (CG-CVC-1) CGD EIGHT (dpi)

LC. BURTON, CAPT

MSU Morgan City

Subj:

Thru:

MARINE CRANE CERTIFICATION EQUIVALENCY

1. Alliance Offshore, LLC. submitted a request for alternative certification and testing of cranes installed on two liftboats currently under construction in MSU Morgan City's OCMI area of responsibility. I believe this is a request for equivalency as defined in 46 Code of Federal Regulations (CFR) 90.15 and am therefore forwarding the request to Coast Guard Headquarters for final determination. I positively endorse Alliance Offshore's request for equivalency.

- 2. The vessels under construction are Conrad Hulls C-1002 and C-1003. These vessels are 200' class liftboats inspected and certificated under 46 CFR Subchapter L. In accoradance with 46 CFR 126.130, cranes installed on Subchapter L vessels must meet the crane certification and testing requirements outlined in 46 CFR Subchapter I-A. The requirements in this section, specifically 46 CFR 107.258 & 107.259 allow acceptance of approved organizations as evidence of condition and suitability of cranes. The only current approved organizations are American Bureau of Shipping (ABS) and International Cargo Gear Bureau (ICGB). All inspection and testing requirements are based on the American Petroleum Institute Recommended Practice for Operation and Maintenance of Offshore Cranes (API RP 2D).
- 3. Because these vessels will not be ABS classed, the sole option for certification and testing of the cranes is ICGB. I believe acceptance of cranes constructed in accordance with the API Specification for Offshore Cranes (API Spec 2C) is an equivalent standard for construction, as this is the recognized U.S. industry standard and the reference ICGB applies for certification. Additionally, the requirements prescribed in 46 CFR 107.259 require witnessing of testing and inspection of cranes in accordance with API RP 2D. With OCMI verification, I recommend allowance for the crane manufacturer, licensed from API to apply the API monogram, to certify each crane and conduct annual testing to satisfy the requirements of 46 CFR 107.258 and 107.259.
- 4. MSU Morgan City has accepted similar equivilencies in the past, enclosure (2). As well, the crane regulations prescribed in 46 CFR Subchapter I-A are currently under revision and discussions with Commandant, Vessel and Facility Operating Standards Division, inidicate significate support to include additional means and procedures for certification and testing of cranes; spefically, acceptance of crane certification from companies or organizations holding a license from API to apply the API monogram.

Subj: MARINE CRANE CERTIFICATION EQUIVALENCY

16711 M-13018 March 27, 2013

5. Aprroval of this equivalency does not relieve the operator from the plan review requirements prescribed in 46 CFR 107.309. My primary point of contact for this issue is CDR Mark McManus.

#

Encl: (1) Alliance Offshore, LLC Letter received March 15, 2013 (2) MSU Morgan City Letter dated January 18, 2005