USCG Office of Commercial Vessel Compliance (CG-CVC)
Mission Management System (MMS) Work Instruction (WI)

Category	Domestic Inspection Program				
Title	U.S. Flagged Vessels Inspected Under Multiple Subchapters ("Multi-Service")				
Serial	CVC-WI-032(1)	Orig. Date	26JUN23	Rev. Date	N/A
Disclaimer:	This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to, nor does it impose legally binding requirements on any part. It represents the Coast Guard's current thinking on this topic and may assist industry, mariners, and the public, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach (you are not required to do so), you may contact the Coast Guard Office of Commercial Vessel Compliance (CG-CVC) at CG-CVC@uscg.mil who is responsible for implementing this guidance.				
References:	(a) CVC-PR-009(series) - MISLE Vessel Inspection and Examination Activity Entry and Review (b) Title 46 U.S.C. Subtitle II, Part F – Manning of Vessels, §§ 8101-9308 (c) Marine Safety Manual Vol III COMDTINST M16000.8B (series) (d) Marine Safety: Domestic Inspections Programs COMDTINST 16000.71				

A. Purpose. This work instruction provides policy regarding the certification of vessels that perform operations and services under multiple inspection subchapters in Title 46 Code of Federal Regulations (CFR). This guidance is intended to create a more efficient certification process in lieu of issuing a full and separate Certificate of Inspection (COI) for each intended vessel service. This work instruction cancels the Commander, Eighth Coast Guard District ltr 16711/OSV dtd 5July2001, (09-2001 Certification of Multi-Service Offshore Supply Vessels) as a standalone document and incorporates it into this policy letter as enclosure (1). Vessel who are currently being inspected to this standard may continue at the OCMIs discretion. This work instruction also supersedes all other locally generated policies regarding the construction and certification of vessels engaged in operations or service under multiple regulatory inspection subchapters.

B. Action. Vessel owners, managing operators, builders, or their representatives should review this work instruction when evaluating vessel operations and services applicable to multiple regulatory inspection subchapters. District Commanders, Sector Commanders, Commanding Officer Marine Safety Center (MSC), and Officers in Charge, Marine Inspection (OCMIs) shall reference this work instruction when evaluating vessels that perform operations and services covered under multiple regulatory inspection subchapters.

C. Background. In 1999, the Coast Guard's Eighth District, in coordination with Commandant (G-MOC),[1] implemented enclosure (1) to facilitate the issuance of COIs endorsed for vessel services under multiple regulatory subchapters, specifically Offshore Supply Vessels. In 2016, the Coast Guard published its newest inspection subchapter, 46 CFR subchapter M, establishing standards for

[1] G-MOC is a legacy Coast Guard Staff symbol for the CGHQ Office of Commercial Vessel Compliance. The Coast Guard Office of Commercial Vessel Compliance symbol is now CG-CVC.

commercial vessels less than 300 gross tons engaged in towing. As the maritime industry continues to grow in capacity and complexity, the Coast Guard recognizes the need for updated guidance and has developed this work instruction to incorporate the general principles of enclosure (1) and provide updated guidance into the national framework.

D. Discussion.

1. General. When a vessel is inspected under more than one regulatory subchapter, it is referred to as a "multi-service vessel." Multi-service vessels should be designed, built, and outfitted to comply with all applicable standards of respective regulation subchapters and applicable international conventions (e.g., SOLAS, MARPOL). A multi-service vessel can only operate **under one inspection subchapter at a time**. Where there is a conflict between inspection subchapters, the vessel **must meet the more stringent standard**. Certain "operational" requirements imposed on the vessel are dependent on the service the vessel is engaged in at that time and shall be noted on the vessel's COI. These requirements generally include manning, carriage of passengers and persons in addition to crew. If a vessel is required to comply with international conventions as part of its compliance regime (e.g., ACP, MSP), it must meet all design and operational standards, including international standards, regardless of route and service. A vessel that was certificated as a multi-service vessel does not qualify indefinitely or automatically as an "existing" vessel, especially when it has been structurally modified or is without a valid COI for an extended period.[2] This work instruction is authoritative where there is a conflict between this policy and Marine Safety Manuals Volume II and Volume III.

2. Plan Review. Each inspection subchapter has specific requirements for construction, stability, marine engineering, electrical engineering, lifesaving, etc. Similarly, vessels subject to SOLAS also have specific requirements based on vessel service. Companies requesting endorsements on a COI under multiple regulatory subchapters must submit plans to the Coast Guard's Marine Safety Center (MSC) for review under each corresponding subchapter. A vessel changing its service may trigger the need for a major conversion determination under 46 U.S.C. § 2101(18). OCMIs should be mindful of this when reviewing an application for a multi-service COI and consult with MSC should they believe a major conversion is taking place.[3]

3. Equivalencies and Exemptions.

   a. The Coast Guard may not arbitrarily exempt vessels from regulation or substitute regulatory applicability or requirements.[4] However, statute, regulations and international conventions provide for alternative requirements,[5] exemptions,[6] and equivalencies.[7] Requests for equivalencies or exemptions must be submitted to the appropriate Coast Guard office per the applicable regulation (e.g., cognizant OCMI, District Commander, COMDT).

      1) An exemption or exemption certificate issued by an appropriate authority excludes a vessel from the applicability of a specific requirement of an international convention or Coast Guard regulation. Exemptions are restricted to circumstances described in the

---

[2] *See* CVC-WI-018(series) - Laid up Inspected/Examined Vessels.
[3] *See* Footnote 10 for MSC major conversion determination information.
[4] U.S. Coast Guard, NVIC 16-82, Navigation and Vessel Inspection Circular No. 16-82 (1982).
[5] *See* 46 CFR § 115.114 (subchapter K—Alternative requirements for a vessel operating as other than a small passenger vessel); 46 CFR § 176.114 (subchapter T—Alternative requirements for a vessel operating as other than a small passenger vessel).
[6] *See* 46 U.S.C. § 3302, 46 U.S.C. § 2113, 46 CFR § 71.75-10 (subchapter H—Exemptions Certificate); 46 CFR § 91.60-25 (subchapter I—Exemption Certificate); 46 CFR § 133.20 (subchapter L—Exemptions), 46 CFR § 176.920 (subchapter T—Exemptions).
[7] *See* 46 CFR §§ 30.15-1 (Tank Vessels), 70.15-1 (Passenger Vessels), 90.15-1 (Cargo and Miscellaneous Vessels), 114.540 (Small Passenger Vessels Carrying More Than 150 Passengers), 125.170 (Offshore Supply Vessels), 136.115 (Towing Vessels), 175.540 (Small Passenger Vessels).

applicable convention or regulation and are typically based on limited routes or service, not the inability to comply with a requirement based on design or operational choices.[8] Recognized Organizations (RO) are not authorized to grant exemptions on behalf of the Coast Guard. ROs should forward exemption requests to Commandant (CG-CVC) at FlagStateControl@uscg.mil via the cognizant OCMI for appropriate action.

2) Equivalents[9] may be granted in certain cases where it can be demonstrated that the safety of a vessel and its crew will not be affected by accepting an alternative standard. All such requests shall be forwarded to the cognizant OCMI for adjudication and shall be fully documented by the Coast Guard unit in the Marine Information for Safety and Law Enforcement (MISLE) database.

b. A Special Note shall be added to the vessel MISLE file upon approval of a request for exemption or equivalents in accordance with reference (a).

c. OSVs certificated in accordance with enclosure (1) should be allowed to continue operating within the pre-existing construction and design equivalents unless a new law, regulation, or Coast Guard Policy requires the application of a current standard, such as a major conversion determination.[10] All new requests regarding inspection under enclosure (1) standards shall follow the above alternative, equivalency, or exemption processes.

d. A Special Note shall be added to the vessel file, at the COI Renewal, noting if an OSV is certificated in accordance with the enclosure (1) of this policy.

> "This vessel is a multi-service vessel inspected under [insert all inspection subchapters] per CVC-WI-032(series) enclosure (1): Commander, Eighth Coast Guard District ltr 16711/OSV dtd 5July2001, (09-2001 Certification of Multi-Service Offshore Supply Vessels)."

4. Certification.

a. Only one COI shall be issued to each multi-service vessel. OCMIs should evaluate every request on a case-by-case basis and discuss all aspects of the vessel's operations to determine the applicable inspection subchapter for the individual vessel's operation. There might be instances where the vessel services requested do not require them to be inspected. (*See* paragraph D.11.g. for information on uninspected vessels.)

b. CG Marine Inspector teams with the full complement of qualifications for the inspection subchapters being requested should conduct the inspection on the vessel (i.e., there should be qualified CG Marine Inspectors on the team with L and K qualifications to conduct a multi-service L and K vessel inspection).

c. A Special Note shall be added to the MISLE vessel file indicating the multi-service capabilities and the subchapters the vessel is inspected under.

---

[8] 46 CFR Chapter I, subchapter I, does not allow for an exemption.

[9] An equivalency is any approved alternate arrangement, fitting, material, appliance, apparatus, equipment, calculation, information, or test that is at least as effective as that required by an international convention, Coast Guard regulation, or RO rule. ROs are not authorized to approve equivalencies on behalf of the Coast Guard. ROs should forward equivalency determination requests for requirements of international conventions and Coast Guard regulations to MSC@uscg.mil for appropriate action. ROs may approve equivalencies for requirements of RO rules without further Coast Guard authorization, provided the rule requirements are not also requirements of international conventions or Coast Guard regulations.

[10] The Coast Guard Marine Safety Center (MSC) makes major conversion determinations. Companies contemplating work that may constitute a major conversion are highly encouraged to contact MSC as soon as the company has a general concept of the work to be performed so it can be reviewed. The Coast Guard bases a major conversion determination on the definition of "major conversion" found within 46 U.S.C. § 2101 and the information within Navigation and Vessel Inspection Circulars (NVIC) 10-81, NVIC 10-82, NVIC 11-84, NVIC 02-95 (series).

d. The COI shall include the following text in the *Routes and Conditions* section:

> VESSEL CERTIFICATED FOR MULTIPLE SERVICES [*Insert all applicable services* (i.e., FREIGHT VESSEL, OFFSHORE SUPPLY VESSEL, INDUSTRIAL VESSEL, PASSENGER VESSEL, TOWING VESSEL, etc.)]. VESSEL MUST CONFORM AT ALL TIMES TO ALL DESIGN AND EQUIPMENT STANDARDS OF THE APPLICABLE RULES AND REGULATIONS [*include international convention when appropriate*]. VARIATIONS FROM STANDARD OPERATING DETAILS AND MANNING ARE DEPICTED BELOW BASED ON SERVICE FOR WHICH THE VESSEL IS ENGAGED. CHANGES IN SERVICE MUST BE LOGGED IN THE VESSEL'S OFFICIAL LOG BOOK.

e. A multi-service vessel must conform at all times to all design and equipment standards of the applicable rules and regulations.[11] A vessel can only operate under one inspection subchapter at a time. Where there is a conflict between inspection subchapters, the vessel shall meet the more stringent standard. If an owner or managing operator has requested OCMI special consideration[12] or an equivalency or exemption, the OCMI must evaluate that request based on all vessel services. If a request is approved for an alternative, exemption, equivalent, or special consideration, the approving official must specify if the approval is for all vessel services or only applicable while conducting a specific service (e.g., special consideration may be approved while operating as a towing vessel on Lakes, Bays, and Sounds route and may not apply while conducting subchapter D tank vessel operations on a near coastal voyage). Additionally, if there is a difference in the approval level for any type of deviation request, it shall go to the highest authority for approval (i.e., if one subchapter requires OCMI approval but the second multi-service inspection service requires COMDT approval for the request, it shall go to COMDT for the determination).

f. Additional Inspections. Conditions of operation for each service shall be specified on the COI; therefore, in most cases, additional inspections should not be required each time a change in service occurs. If additional equipment is added or removed as the service changes, further inspection by the Coast Guard may be required (e.g., portable accommodation modules or dive saturation equipment is added or removed for another vessel service). RO and Third-Party Organizations (TPO) performing certification and services on behalf of the Coast Guard may likewise require additional inspection or survey when a change in service requires modification to vessel systems or additional equipment is added or subtracted from the vessel, resulting in changes to the safety management system (SMS) procedures.[13]

g. A vessel can only operate under one inspection subchapter at a time. It is the responsibility of the vessel owner, operator, and master to ensure that the vessel is operated within the terms and conditions specified on its COI. Changes in vessel service shall be logged in the official

---

[11] Including international conventions as required by service and route or by an alternate inspection program (e.g., a vessel enrolled in the Alternate Compliance Program must meet the design and equipment standards required by international conventions regardless of route). At the time of COI inspection (annual and renewal) in order to maintain the COI for multi-service, the vessel must be in a condition and have all the equipment available for inspection, to meet all the requirements for all the multiple service operations is has on the COI. For example, the vessel is a subchapter M, T, and uninspected fishing vessel it shall at the time of certification, have all the equipment available for inspection such as the passenger life jackets and towing vessel gear etc., to keep the service endorsements.

[12] Per CVC-WI-010(series)—OCMI Guidance on Special Consideration for 46 CFR Sub M Vessels, authorized special consideration is only valid within the OCMI zone in which it was granted.

[13] If an additional inspection is needed by the Coast Guard, an "in-service" inspection should be annotated in MISLE for transparency and documentation purposes.

logbook (if carriage of a logbook is required),[14] the unofficial logbook, Towing Vessel Record (TVR), or as otherwise directed by SMS or the TSMS (per 46 CFR § 140.910).

5. User Fees. For multi-service certification, the Coast Guard Finance Center will assess annual vessel inspection fees based on the service with the highest fee amount. When a COI is issued to a multi-service vessel, and the added service increases the required inspection fee, as noted in 46 CFR table 2.10-101, the OCMI must forward the vessel information indicating that the vessel is multi-service and the service classification that will result in the higher fee to the Coast Guard Finance Center to ensure the correct charges are being applied. The vessel's service designation on the COI shall be based on the *service with the **highest user fees***, as required by 46 CFR § 2.10-101(a)(2).

6. Manning.[15] Per references (b) and (c), multi-service vessels shall have a COI structured to specify all the appropriate manning for each service and voyage length, including any operational restrictions. Where desired, the company should include all services in the manning proposal (*See* reference (c), Chapter B1). The ***highest manning level*** must be specified in the top 'Manning Block' of the COI. All subordinate or reduced levels of manning authorized must be detailed under the 'Routes Permitted and Conditions of Operations' section of the COI. When a multi-service vessel is not operating in its primary service, it is required to meet the manning requirements of the applicable service as specified on the COI per reference (c).

7. Credentialing. When a vessel is inspected under more than one subchapter, mariners must hold merchant mariner credentials commensurate with the vessel's service at the time of operation, in accordance with 46 U.S.C. § 8301, 46 U.S.C. Chapter 89, and 46 CFR part 15 and as determined by the OCMI per reference (b).

8. Training. Per 46 CFR § 15.405, each credentialed crewmember must become familiar with the relevant characteristics of the vessel appropriate to his or her duties and responsibilities (e.g., as a lookout or on an engineering watch) prior to assuming those duties and responsibilities. As a multi-service vessel, the crew should be familiar with any unique systems onboard, irrespective of the vessel's current operational service.

9. Watchkeeping. Vessels must maintain the appropriate watchkeeping per reference (b) and 46 CFR part 15, based on the applicable tonnage, route, and service.

10. Navigation Lights and Day Shapes. The vessel must be able to display navigation lights and day shapes for the most stringent requirements but must only display such navigation lights and day shapes for the service being performed and in accordance with International and Inland Navigation Rules, for any condition which may be encountered.

11. Specific Guidance for Various Multi-Service Combinations.

    a. Oil Spill Response Vessel (OSRV). An OSRV, is a vessel subject to inspection[16], and is defined as "a vessel that is designated in its certificate of inspection as such a vessel, or that is adapted to respond to a discharge of oil or a hazardous material."[17] See reference (d) for

[14] *See* 46 U.S.C. § 11301; 46 CFR § 35.07-5 (subchapter D), 46 CFR § 97.35-3 (subchapter I); 46 CFR §§ 122.280 & .282 (subchapter K); 46 CFR § 131.610 (subchapter L), 46 CFR § 140.905 (subchapter M), 46 CFR § 196.35 (subchapter U).
[15] Under 46 U.S.C. § 8101, 46 CFR § 15.105(c), and 46 CFR § 15.501, the Coast Guard has the authority to determine what manning complement requirements are necessary for a vessel's safe operation and to mandate those requirements through the vessel's COI. Additionally, the Coast Guard has the discretionary authority to modify the manning complement requirements for reasons of "changed conditions or employment," such as a change in route or operations, to include a change from an active to an inactive status (46 U.S.C. § 8101(b)).
[16] 46 U.S.C. § 3301(14).
[17] 46 U.S.C. § 2101(27).

more inspection guidance on Oil Recovery Vessels and MSRC Small Mechanically Fastened Shallow Water Oil Spill Response Vessels (OSRVs).

1) While an OSRV may need to tow boom or containment barges, the service of the vessel is oil or hazardous material spill response, and any towing would generally be incidental to the vessel operations.[18] Accordingly, the vessel should not be subject to 46 CFR subchapter M when engaged in activities where they are towing boom or oil spill response equipment. These activities include the pre-positioning of equipment and training exercises. Depending on the size and carriage of oil or hazardous materials, the vessel may be subject to other inspection requirements. (*See* reference (d) for additional guidance.)

2) As an inspected vessel category[19] the following criteria must be applied to OSRV: oil recovery vessel, in plan review and certification per reference (d):

    a) A vessel with no onboard oil holding capacity must only be an OSRV inspected under 46 CFR subchapter I if the gross tonnage (>15 GT) or the means of propulsion so required. Otherwise, the vessel must be an uninspected OSRV (those less than 15 GT).

    b) A vessel with an oil holding capacity of less than or equal to 20 percent of the deadweight tonnage must be an inspected OSRV under 46 CFR subchapter I. Such amounts of oil must be considered as "limited quantities" under 46 CFR § 30.01-5 and 46 CFR § 90.05-35.

    c) A vessel with a holding capacity greater than 20 percent of the deadweight tonnage must be an inspected as an OSRV under 46 CFR subchapter D (Tank Vessels).

    d) When holding recovered oil, a vessel certificated under 46 CFR subchapter I must meet the requirements of 46 CFR subchapter D.

    e) Inspected OSRVs shall receive a COI and be charged inspection user fees per 46 CFR § 2.10.

    f) Uninspected OSRVs shall be issued a designation letter signed by the local OCMI. The designation letter, valid for 5 years, shall be scanned into the CG MISLE vessel file.

3) Most oil recovery vessels are designed for use with Grades D and E liquids. If use with more flammable grades or with hazardous chemicals is desired, Commandant (CG-ENG) should be consulted. Vessels engaged in other service when not operating as oil recovery vessels must meet normal requirements for that service.

4) Vessel of Opportunity (VOO). The National Defense Authorization Act for Fiscal Year 2023, section 11316 introduced a definition of a "vessel of opportunity" as "a vessel engaged in spill response activities that is normally and substantially involved in activities other than spill response and not a vessel carrying oil as a primary cargo." A VOO is not defined in 46 U.S.C. § 2101, nor in inspection regulations within 46 CFR Chapter I. As an OSRV *is* defined by 46 U.S.C. 2101(27) in part, as a vessel "that is

[18] Shell Offshore, Inc. v. Tesla Offshore, L.L.C., 905 F.3d 915, 921 (5th Cir. 2018) (citing Mount v. Keahole Point Fish, 147 F. Supp. 3d 1116, 120-21 (D. Haw. 2015)) (Title 46 U.S.C. § 2101(52) "defines a towing vessel in terms of the service it provides. We interpret this language to exclude vessels that engage in some incidental pulling, pushing, or hauling activities as part of a distinct commercial endeavor. A fishing vessel that pulls nets or cages in furtherance of its fishing activities would not qualify as a towing vessel because it is in the business of fishing, not 'in the service of pulling.'").
[19] 46 U.S.C. § 3301(14).

adapted to respond to a discharge of oil or a hazardous material," and a VOO *is explicitly capable of* responding to a discharge of oil or hazmat. Accordingly the CG has determined that a VOO is a specific type of OSRV that is "adapted to respond to a discharge of oil or hazmat" but is more narrowly defined by the 2023 NDAA as engaging "in spill response activities that is normally and substantially involved in activities other than spill response and not a vessel carrying oil as a primary cargo".[20] Consequently, a VOO is a type of OSRV, but due to the specific definition provided by the 2023 NDAA, an OSRV cannot be a VOO[21].

5) Any vessel that is confirmed by the OCMI as an OSRV or a VOO, on either the COI or in writing,[22] is not subject to the towing vessel regulations under 46 CFR subchapter M if such vessel is:

   a) Towing boom or oil spill response equipment, for oil spill response; or

   b) Participating in an oil response exercise.[23]

6) In accordance with 46 U.S.C. § 8905, "while engaged in oil spill response or training activities," an OSRV and a VOO are exempt from 46 U.S.C. § 8904, which requires a licensed individual for a towing vessel.

7) Towing of oil recovery barges by an OSRV should be reviewed on a case-by-case basis. OCMIs should consider the size, capacity, and route of the barge when considering requirements for the vessel towing it to be crewed by a Master with a towing endorsement.[24] Because the definition of a VOO includes that it cannot "carry oil as a primary cargo" and they are only exempt from 46 CFR subchapter M when towing boom or oil spill response equipment, a VOO **cannot engage in pushing, pulling, or hauling alongside, barges or other containments carrying oil or hazardous cargo in bulk.** Per 46 CFR § 136.105, this would subject them to towing vessel regulations. **Additionally, they cannot carry on deck or in its holds, voids or cargo tanks, oil as a primary cargo in their current vessel service or as a VOO.** This would exclude from the definition of a VOO any vessel inspected under 46 CFR Chapter I if they carry oil as a primary cargo.

8) As an inspected vessel category[25] the following criteria must be applied to verify an inspected or uninspected vessels multi-service operations as a VOO.

   a) As the 2023 NDAA definition highlights, a VOO must be **normally and substantially engaged in other activities** outside of oil spill response activities. Such vessels could engage in activities that subjects vessels to inspection per 46 U.S.C. § 3301 (except for an OSRV because an OSRVs primary duty is oil spill response). Objective evidence of normal and substantial engagement in other activities could be in the form of a valid Certificate of Documentation or a valid COI for a service other than an OSRV.

---

[20] Although a VOO is an OSRV, a VOO is considered a subset of a type of OSRV in that a VOO is capable of responding to a discharge of oil or hazmat but does not carry oil as a primary cargo.

[21] *See* 33 CFR § 155.1015(a), (c)(4) (a VOO is not required a Tank Vessel Response Plan for Oil when the vessel is not constructed or adapted to carry, or that carries, oil in bulk as cargo or oil cargo residue).

[22] A letter shall be issued by the local OCMI when the vessel is currently operating as an uninspected vessel and would like to be recognized as an uninspected OSRV or a VOO, otherwise the endorsement will be added to the inspected vessels COI for multi-service in accordance with this WI.

[23] *See* 46 U.S.C. § 3306 note (Pub. L. 117–263, div. K, title CXIII, § 11316, Dec. 23, 2022, 136 Stat. 4089).

[24] Per 46 CFR § 136.105 the subchapter M towing vessel regulations are applicable to vessels greater than and less than 26 feet if the vessel is pushing, pulling, or hauling, a barge that is carrying oil or hazardous material in bulk.

[25] 46 U.S.C. § 3301(14).

b) While a VOO is not subject to 46 CFR *subchapter M* while towing boom or oil spill response equipment for an oil spill response or participating in an oil spill response exercise, any VOO that is also a seagoing vessel of greater than 300 gross tons *may* be subject to the provisions of 46 CFR subchapter I, if the vessel is engaged in towing.[26] Additionally if a VOO is conducting any other commercial activity, other than those specified within the 2023 NDAA, they will be subject to inspection per 46 U.S.C. § 3301 and applicable regulations.

c) Inspected vessels that qualify and are designated as a VOO, shall have an endorsement added to their COI:

THIS VESSEL HAS BEEN DESIGNATED AS A VESSEL OF OPPORTUNITY (VOO), FROM [MMDDYYY} to [MMDDYYY]. THIS VESSEL MUST BE NORMALLY AND SUBSTANTIALLY ENGAGED IN OTHER ACTIVITIES OUTSIDE OF OIL SPILL RESPONSE AND IS NOT A VESSEL CARRYING OIL AS A PRIMARY CARGO. THIS VESSEL IS NOT SUBJECT TO 46 CFR SUBCHAPTER M WHILE TOWING BOOM OR OIL SPILL RESPONSE EQUIPMENT FOR AN OIL SPILL RESPONSE OR PARTICIPATING IN AN OIL SPILL RESPONSE EXERCISE.

d) An uninspected vessel that qualifies as a VOO shall be issued a letter signed by the local OCMI. The letter, valid for no more than 5 years, as determined by the local OCMI, shall be scanned into the CG MISLE vessel file as a document (entitled: VOO Designation Letter). *See* enclosure (2) for an example template. A Special Note shall be added to the MISLE vessel file indicating the OSRV or VOO status.

e) If a vessel neither qualifies as an OSRV or a VOO but would like to tow in response to a pollution event, they may request to apply 46 CFR § 136.110 as an excepted vessel or as a workboat in a designated worksite[27] per 46 CFR § 136.105(3). *See* table (1) for more information.

CVC-WI-032(1): table (1)

Vessel Type:	**Participate in Pollution Response**	**46 CFR subchapter M applicable to tow boom or oil spill response equipment.**	**46 CFR subchapter M applicable to tow oil or hazardous materials in bulk.**
OSRV - (COI)	Y	N	N
OSRV - Uninspected	Y	N	N
VOO - (COI/Uninspected)	Y	N	Y
Excepted Vessel - (Issued a COI - Sub M) *See* 46 CFR § 136.110.	Y (Excepted from only certain Sub M regs)	Y (Excepted from only certain Sub M regs)	Y (Excepted from only certain Sub M regs)
Workboat - (Issued WSE/Workboat Designation Letter) *See* 46 CFR § 136.110.	Y (*See* CVC-WI-001(series)).	N (Only tow intermittently)	Y (*See* CVC-WI-001(series)).

[26] 46 CFR § 136.105 Applicability.
[27] *See* CVC-WI-001(series) – Worksite Exception (WSE) requests and Workboat Designation.

b. Self-Propelled Barges. A deck barge that is intended to be towed but can also operate with self-propulsion or in dynamic positioning (DP) mode shall be certificated as a freight vessel. Operations as a freight vessel must comply with relevant statutory and regulatory requirements for manning and watchkeeping reference (d).

c. Commercial Fishing Vessels (CFV). A fishing vessel is defined as "a vessel that commercially engages in the catching, taking, or harvesting of fish or an activity that can reasonably be expected to result in the catching, taking, or harvesting of fish."[28] CFVs pulling nets are categorically distinct from towing vessels[29] and therefore must not be inspected as towing vessels.[30] Similarly, a CFV towing a fish pen may not be subject to inspection under 46 CFR subchapter M as its operations may be expected to result in the catching, taking, or harvesting of fish per 46 U.S.C. § 2101(12). Additionally, per the National Defense Authorization Act for Fiscal Year 2023, section 11316, a fishing vessel,[31] while that vessel is operating as a VOO, is not subject to 46 CFR subchapter M. (*See* section 11.a.4 for more details on VOO guidance.)

d. Carriage of Fuel or Oil as Cargo. When carrying fuel or oil as cargo in bulk, vessels, such as tank vessels,[32] tankships, or tank barges must meet applicable requirements of 46 CFR subchapter D.[33]

1) 46 CFR § 30.01-5 provides regulations for other vessel types whose principal purpose or use is not the carriage of flammable or combustible liquid cargo in bulk, which may be permitted by the OCMI to carry limited quantities of these cargoes[34] (i.e., passenger vessels, cargo vessels, and miscellaneous vessels).[35] The OCMI shall list cargo carrying authority and endorsements on the COI.

2) Additionally, under special circumstances, vessels employed in fisheries (fishing or fish tenders <500GT) may carry and dispense fuel within the fishing industry due to being exempted from subchapter D.[36] Towing vessels and small passenger vessels are not permitted by 46 CFR subchapter D to carry limited quantities of flammable or combustible liquid cargo in bulk.[37]

e. TSMS Option Towing Vessels. Towing vessels that are subject to 46 CFR subchapter M and certificated under the Towing Safety Management System (TSMS) are not permitted to use the TSMS option for certification under any other vessel service, as the TSMS option only exists under 46 CFR subchapter M. Therefore, while the vessel may operate under TSMS as a

---

[28] 46 U.S.C. § 2101(12).
[29] CVC-WI-010 (series)-OCMI Guidance on Special Consideration for 46 CFR Sub M Vessels.
[30] Shell Offshore, Inc. v. Tesla Offshore, L.L.C., 905 F.3d 915, 921 (5th Cir. 2018) (citing Mount v. Keahole Point Fish, 147 F. Supp. 3d 1116, 120-21 (D. Haw. 2015)) (Title 46 U.S.C. § 2101(52) "defines a towing vessel in terms of the service it provides. We interpret this language to exclude vessels that engage in some incidental pulling, pushing, or hauling activities as part of a distinct commercial endeavor. A fishing vessel that pulls nets or cages in furtherance of its fishing activities would not qualify as a towing vessel because it is in the business of fishing, not 'in the service of pulling.'").
[31] 46 U.S.C. § 2101(12).
[32] 46 U.S.C. § 2101(51) "tank vessel" means a vessel that is constructed or adapted to carry, or that carries, oil or hazardous material in bulk as cargo or cargo residue, and that- (A) is a vessel of the United States; (B) operates on the navigable waters of the United States; or (C) transfers oil or hazardous material in a port or place subject to the jurisdiction of the United States.
[33] 46 CFR § 30.01-5.
[34] *See also* 46 CFR §§ 30.01-5(a)(1)-(3), 70.05-30, and 90.05-35.
[35] *See* reference (d) for additional information related to carriage of limited quantities.
[36] *See* 46 U.S.C. § 3702(c) and (d) for further details.
[37] Per Federal Register /Vol. 58, No.23 / Friday, February 5, 1993, 7382 Applicability, that cargo does not include "oil transferred between a towing vessel and a vessel in its tow" based on the low-risk secondary carriers pose. (7380 Discussion of general issues).

towing vessel, it must be certificated and inspected annually for any other vessel service by the Coast Guard. (Refer to paragraph D.5., for User Fee applicability.)

f. Carrying Freight for Hire. A vessel over 15 gross tons that carries freight for hire onboard the vessel, is subject to inspection under 46 CFR subchapter I, except those covered and inspected under 46 CFR subchapters D and T, H, or K per 46 CFR table 2.01-7(a).[38]

g. Uninspected Vessel Service. An uninspected vessel regulated under 46 CFR subchapter C is a vessel that operates in a service that does not require inspection for certification[39] (e.g., uninspected passenger vessels, smaller industrial vessels (<300 GRT), certain classes of vessels employed in fisheries, towing vessels < 26ft: unless towing hazmat, etc.). Inspected vessels with a COI may operate in services that do not require them to be inspected and as such will not be required to surrender the COI to do so. The scope of vessel operations and services authorized by the OCMI under 46 CFR subchapter C should be annotated on the COI.[40]

E. Appeals. Appeals of decisions made regarding specific design requirements or equivalency requests should follow the appeal procedure outlined in 46 CFR § 1.03.

F. Questions. Questions concerning this Work Instruction and guidance should be directed to the Office of Commercial Vessel Compliance (CG-CVC) at CGCVC@uscg.mil.

M. R. Neeland
Captain, U.S. Coast Guard
Chief, Office of Commercial Vessel Compliance
By direction

Enclosure: (1) Commander, Eighth Coast Guard District ltr 16711/OSV dtd 5 July 2001, (09-2001 Certification of Multi-Service Offshore Supply Vessels)
(2) Oil Spill Response Vessel – Vessel of Opportunity (VOO) Letter Template

[38] *See also* reference (d) for additional information related to passenger vessels (46 CFR subchapter T).
[39] These vessels may require a Loadline Certificate per 46 CFR Chapter I, subchapter E. Load Line requests should be routed through the respective District or COMDT for approval in accordance with reference (d).
[40] Required for 46 CFR §§ 115.114 and 176.114.

Enclosure (1): Commander, Eighth Coast Guard District ltr 16711/OSV dtd 5 July 2001, (09-2001) Certification of Multi-Service Offshore Supply Vessels)

U.S. Department of Transportation
United States Coast Guard

Commander
Eighth Coast Guard District
Hale Boggs Federal Building

501 Magazine Street
New Orleans, LA 70130-3396
Staff Symbol: (mvs)
Phone: (504) 589-6193
FAX: (504) 589-4999

16711/OSV
D8(m) Policy ltr 09-2001
5 July 2001

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: CERTIFICATION OF MULTI-SERVICE OFFSHORE SUPPLY VESSELS (OSVs)

Ref: (a) Commandant (G-MOC) ltr 16711 dtd 25 November 1999

1. PURPOSE: This letter provides policy by which certain vessels may be designed, inspected, and certificated for service as an OSV under 46 CFR Subchapter L as well as for other services within the scope of 46 CFR Subchapter I (Cargo and Miscellaneous Vessels). Subsequent modifications of this letter may be developed to broaden its applicability to existing OSVs inspected under 46 CFR Subchapter I. This policy does not apply to any type of passenger vessel (Subchapters T, K or H) or to liftboats inspected under Subchapters I or L.

2. DISCUSSION:

a. Currently, OSVs have been restricted exclusively to support of the offshore oil and mineral industry. Increasingly, these vessels have requested changes in service to freight, industrial or towing vessels. Although the regulations allow for multi-service certification, OCMIs have been reluctant to issue a certificate, let alone two, without conducting an inspection each time the operator physically alters the vessel as it shifts from one service to the other. In fact, past practice has been to issue one certificate at a time for the appropriate service, thus creating an administrative and inspection burden each time a vessel changes service. Issuing a single Certificate of Inspection (COI) will allow more judicious use of Coast Guard resources, while at the same time ensuring public safety and facilitating industry. Reference (a) authorized the Eighth Coast Guard District to take the lead in developing a multi-service vessel certification policy. With the concurrence of Commandant (G-MOC), D8 (mvs) has developed this policy based on the input from a work group consisting of industry and Coast Guard representatives.

b. This policy letter is solely applicable to new OSVs built to 46 CFR Subchapter L standards which have a need to engage in both offshore supply service and various missions that are not in support of the offshore industry, such as the carriage of freight, industrial, or towing vessel service. As a general rule, multi-service vessels should be designed, built, and outfitted to the more stringent applicable standards of Subchapters L and I and applicable SOLAS requirements. This concept is the fundamental philosophical basis for multi-service certification of OSVs. Operational requirements imposed on the vessel will be dependent on the service the vessel is engaged in at that time (e.g. manning, carriage of certain cargoes, etc.). Under this policy, multi-service certification will only be available to vessels in the OSV and cargo and miscellaneous vessel categories.

Subj: CERTIFICATION OF MULTI-SERVICE OFFSHORE SUPPLY VESSELS (OSVs)

c. Multi-service certification is acceptable when the OCMI is reasonably satisfied that the vessel is constructed, maintained, and outfitted so as to be in compliance with the applicable regulations regardless of which service the vessel is in at any given time. With the vessels material condition and outfitting fixed, operating conditions, manning, and possibly total persons allowed may vary depending on the applicable regulations and can be addressed accordingly in a COI endorsement for the alternative service. The material condition and outfitting of the vessel should not normally be among the variables, otherwise the OCMI is put in a position of verifying compliance as changes are made.

d. This policy incorporates the following assumptions:

(1) Only one COI should be issued to each multi-service vessel.

(2) A multiple service vessel must conform at all times to the most stringent design and equipment standards of the applicable rules and regulations (including SOLAS if applicable). Operational requirements, such as manning, carriage of oil, licensing of crew, etc, will vary depending on actual vessel use.

(3) Conditions of operation for each service will be specified on the COI; therefore, additional inspections should not be required each time a change in service takes place. It is the responsibility of the vessel owner, operator, and master to ensure that the vessel is operated within the terms and conditions specified on its COI.

(4) User fees for multi-service certification will be based upon the service that results in assessment of the higher user fee amount.

e. This policy letter does not address the multi-service certification of existing OSVs built to the standards of 46 CFR Subchapter I. Although multi-service certification of these vessels is not prohibited by this policy, there are significant technical and regulatory issues associated with multi-service certification of existing OSVs certificated under 46 CFR Subchapter I. Possible readmeasurement of these existing Subchapter I OSVs seeking multi-service certification may be required due to loss of water ballast and other tonnage exemptions available exclusively to vessels engaged in OSV service. If the vessel's new tonnage is greater than 500 GT, the requirements of SOLAS (for vessels on international voyages) and the marine engineering and electrical regulations in 46 CFR Subchapters F & J will have to be carefully considered. That analysis is beyond the scope of this policy.

f. Currently, vessels inspected under 46 CFR Subchapter I are allowed to participate in the Alternative Compliance Program (ACP) while OSVs inspected under 46 CFR Subchapter L are not. The regulations at 46 CFR 8.400 through 8.450 and Change 1 to NVIC 2-95, "U.S. Coast Guard's Alternative Compliance Program," describe procedures for accepting certain plan review, and inspection functions performed by recognized classification societies. Regulations are expected to be proposed in the next few months to allow OSVs inspected under 46 CFR Subchapter L to participate in the ACP. After these regulations are finalized, plan review and

Subj: CERTIFICATION OF MULTI-SERVICE OFFSHORE SUPPLY VESSELS (OSVs)

inspection of multi-service vessels (under 46 CFR Subchapters I and L) may be conducted under the provisions of the ACP.

3. ACTION: Eighth district OCMIs shall:

a. Use the guidelines provided by this policy letter to promote a consistent district wide approach to certification and operation of multi-service vessels.

b. Use the guidelines in enclosure (1) when evaluating multi-service certification of OSVs designed and built to the standards of 46 CFR Subchapter L.

c. Use the guidance in enclosure (2) when considering automation requirements for multi-service vessels.

d. Use the sample COI endorsements in enclosure (3) when developing COI endorsements for multi-service vessels.

e. Consider the table in enclosure (4) to help determine the differences between requirements of 46 CFR Subchapter L, I and SOLAS.

4. Equivalencies may be granted by Commander, Eighth Coast Guard District (m) in certain cases where it can be demonstrated that the safety of a vessel or its crew will not be affected by accepting an alternative standard. All such requests must be forwarded to the Eighth District via the cognizant OCMI who should provide an endorsement and recommendations.

R. J. MORRIS
By direction

Encl: (1) General guidance on multi-service certification of OSVs built to 46 CFR Subchapter L
(2) General Automation Considerations
(3) Sample Multi-Service Vessel COI Endorsements
(4) Comparison Table: 46 CFR Subchapter L, I and SOLAS

Dist: All Eighth District MSOs, MSU and MSDs

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

General Guidance on Multi-Service Certification of OSVs Built to 46 CFR Subchapter L

1. General: This enclosure is designed to highlight a number of significant design and operational differences between OSVs constructed to the standards of 46 CFR Subchapter L and vessels certificated as cargo and miscellaneous vessels under 46 CFR, Subchapter I. This information was developed during earlier efforts to certify multi-service OSVs. It is not expected that this list is all-inclusive, however, it describes a number of the more significant issues encountered during multi-service certification of OSVs.

2. Application for Inspection: Vessel owners and/or operators must submit a Coast Guard Application for Inspection (CG Form 3752) or locally accepted equivalent form to the cognizant OCMI to have a new construction or existing Subchapter L OSV considered for multi-service certification. The Application for Inspection must specify the cargo and miscellaneous vessel service(s) in which the vessel wishes to engage (e.g. freight, industrial and/or towing).

3. Plan Review and Inspection:

a. Plan Review: The Commandant is tasked with the responsibility to determine that vessels subject to inspection meet the applicable sections of the regulations. The primary means of carrying out this task, in addition to actual inspection of a vessel by field units, is by review and approval of vessel plans and specifications. The general requirements for plans, drawings, and blueprints are found in 46 CFR 2.90-1. Specific recommended practices and procedures for the submittal of plans and specifications are detailed in NVIC 8-84 (Recommendations for the Submittal of Merchant Vessel Plans and Specifications). Plans may be submitted to the OCMI, the Marine Safety Center (MSC) or to the American Bureau of Shipping (ABS) in accordance with NVIC 8-84 or the Memorandum of Understanding between the Coast Guard and ABS as discussed in NVIC 10-82, CH2 (Plan Review and Inspection Tasks Performed by the American Bureau of Shipping (ABS) for New Construction or Major Modification of U.S. Flag Vessels). Plan submission in accordance with NVIC 10-92, Change 1 (Coast Guard Recognition of Registered Professional Engineer Certification of Compliance with Coast Guard Requirements) is also allowed. Vessel owners must inform the cognizant OCMI of their desire to have the plans reviewed for multi-service certification. Plan review will not begin by either party until receipt of an Application for Inspection by the cognizant OCMI has been confirmed.

b. Plan submission: Plan submission to the Marine Safety Center will be required for all new construction projects involving multi-service certification. In addition, OCMIs are strongly encouraged to insure that vessel owners/operators submit plans to the Marine Safety Center for existing Subchapter L OSVs applying for multi-service certification. In addition to the plans identified in 46 CFR 127.110, the plans noted in 46 CFR 91.55-5(b) will also be required as applicable.

c. OCMI Involvement: Frequently, the local OCMI may have knowledge or concerns regarding the design or operation of a particular vessel or class of vessels. In these cases, the MSC should be notified promptly of any items that the OCMI considers worthy of special consideration. OCMI's are encouraged to communicate with the MSC or Commandant (G-MOC), as appropriate, when requests are received for inspection of new construction or conversions of multi-service vessels for which approved plans and related correspondence are not held.

d. Engineering vital systems and automation: New OSVs less than 500 GT which meet the automation requirements in 46 CFR Subchapter L need not meet any of the additional automation requirements in 46 CFR Parts 61 and 62. For Subchapter L OSVs greater than 500 GT, with any vital system automation, a Coast Guard technical review must be conducted to ensure compliance with the requirements in 46 CFR 61.40 and the applicable sections of 46 CFR part 62.

(1) Engineering Control Center (ECC) Definition: The centralized engineering control, monitoring, and communications location. Because of the compact environment and location of vital machinery within the enginerooms of most OSVs, the engineroom may be considered as the ECC. To be considered an ECC, an OSV's engineroom must contain all the vessel's vital propulsion and electrical generating equipment and associated control systems. Vital valves, motors and control systems must be operable from above the deck plates. A separate and distinct ECC will not be required for the purposes of this policy letter.

(2) Minimally attended**:** Vessels under consideration for a minimally attended engineroom must undergo a review to ensure compliance with 46 CFR 61.40 and 62.01 through 62.50-20. Minimally attended machinery plants are automated, but not to a degree where the plant could be left unattended. Emphasis is placed primarily on centralized remote control and monitoring of the machinery plant and machinery spaces. In addition, adequate communications are required for the safety of the engineer and to allow summoning of additional personnel in case of an equipment emergency. In most cases, one licensed engineer will be on watch at all times. Recently, a policy decision was developed by G-MSE-3 regarding the equivalency of the American Bureau of Shipping's ACC notation to the U.S. Coast Guard's "minimally attended" regulations (see G-MSE-3 memorandum "Minimally Attended/ACC Holding File" dated 23 April 2001). The Coast Guard concluded that six additional items beyond ABS ACC notation would be required to meet USCG minimally attended requirements.

(3) Periodically unattended**:** Vessels under consideration for periodically unattended enginerooms must undergo a review to ensure compliance with 46 CFR 61.40 and 62.01 thorough 62.50-30. If SOLAS requirements are applicable, plans must be reviewed to determine if compliance exists with the regulations of Subpart E of Chapter II-1. The regulations set forth in Subpart E of SOLAS are only one grouping of regulations that apply to periodically unattended machinery spaces. The following SOLAS regulations apply to vessels with a periodically unattended machinery spaces endorsement: II-1/46; II-1/47; II-1/48; II-1/49; II-1/50; II-1/51; II-1/52; II-1/53; II-2/4.3.4.3; II-2/11.7; II-2/14; II-2/15.5 (SOLAS 1997, Consolidated Edition).

e. Second means of Egress from occupied spaces: For OSVs operating as a freight vessel with a periodically unattended, minimally attended, or fully manned engineroom, compliance with 46 CFR 92.10-5 must be verified. If the vessel has a separate engineering control center (ECC), there must be two means of escape from the ECC (one of which does not go through the engineroom).

f. Fire fighting: On vessels greater than 1500 GT, exterior fire fighting stations may substitute a Siamese configuration using 1½ inch diameter hoses instead of 2½ inch diameter hoses as is allowed for interior locations by 46 CFR 95.10-10(b)(a). For vessels employing this substitution, the firemain system must meet the water demand requirements in 46 CFR 95.10-5(c) and 95.10-15(c) which require the fire pump capacity be determined as if 2 1/2 inch outlets had been provided. If a larger capacity fire pump is required on an existing OSV to meet this requirement, an analysis of the emergency generator load is necessary.

g. Structural Fire Protection: 46 CFR Subchapter L has minimal requirements for structural fire protection (46 CFR 127.220). Subchapter I requires more rigorous structural fire protection for all cargo and miscellaneous vessels over 4000 GT *and* for those industrial vessels over 300 GT that also carry more than 12 industrial personnel (46 CFR 92.07). SOLAS structural fire protection requirements are also applicable to vessels to which SOLAS applies.

h. Rescue Boats: Both 46 CFR Subchapter I and Subchapter L require rescue boats. Subchapter L, however, allows substitution of the required rescue boat with a "workboat or launch" or an alternative personnel recovery device (sometimes referred to as a rescue platform) in certain circumstances (46 CFR 133.135). These alternatives are not available for vessels inspected under 46 CFR Subchapter I. Thus, multi-service certificated vessels will be required to carry a Coast Guard approved rescue boat at all times, not simply when operating under Subchapter I.

i. Stateroom capacities:

(1) 46 CFR Subchapter I does not specifically mention accommodations for industrial personnel. However, the Coast Guard has gone on record that there should be no difference in accommodation spaces for a vessel's regular complement of industrial personnel and the required crew (e.g. Federal Register of December 4, 1978, Preamble of the final rule for Mobile Offshore Drilling Units, page 56791). Industrial personnel on board industrial vessels are employed and berthed in a manner and duration very similar to that encountered by the industrial personnel on MODUs. Accordingly, the application of a MODU accommodation standard (46 CFR 108.201) would philosophically and logically be more appropriate than an OSV standard (for offshore workers) for vessels being employed as industrial vessels.

(2) 46 CFR Subchapter L OSVs engaged in freight, towing or industrial vessel operations will have the number of persons on board, based on the berthing specifications of 46 CFR 127.280(a). Thus, a multi-service vessel authorized for OSV and one or more cargo and miscellaneous vessel services shall have sleeping rooms of such size that there is at least 30 square feet of deck area and a volume of at least 210 cubic feet of space for each person accommodated. This standard applies to vessel crew, industrial personnel and offshore workers.

(3) The total number of persons on board while a vessel is engaged in operations as a freight, towing or industrial vessel will be based on the berthing as follows:

(a) Each stateroom may accommodate a maximum of 4 persons unless specific approval has been granted by Commandant, in which case a maximum of 6 persons may be accommodated in any one stateroom.

(b) Where practical, the Master and Chief Engineer should have individual staterooms per 46 CFR 92.20-20. The remaining officers may be berthed two per room.

(c) Staterooms for crew members must be separate from those provided for offshore workers (or industrial personnel) per 46 CFR 127.270(h) unless alternative arrangements are approved by the OCMI.

j. Hospital Space: A hospital space is required (46 CFR 92.20.35) when the vessel is operating in any cargo and miscellaneous vessel service (freight, industrial or towing) on voyages of more than three days duration and when there are 12 or more crew on board. The maximum number of crew required in any operating condition on the vessel's Certificate of Inspection will be used to determine the need for a hospital space, regardless of the number of installed accommodations. When a hospital space is required, an existing stateroom may be designated as a hospital space. This stateroom must be configured for single occupancy so long as it is utilized as the required hospital space. This space must not be normally occupied when set aside as the designated hospital and must have a washbasin with hot and cold running water installed in the space, or immediately adjacent.

(1) The total persons allowed on the vessel while it operates as a freight or industrial vessel must be reduced, if necessary, to account for any reductions in required berthing when a stateroom is set aside as the required hospital space.

(2) In a recent appeal (Commandant G-MOC letter 16711 of 6 March 2000), Commandant ruled that when a vessel is operating as an industrial or freight vessel on an oceans route not more than 200 miles from shore and not on an international voyage, the requirement for a hospital space may be waived provided the following provisions are met:

(a) An approved medical emergency evacuation procedure must be on board each vessel that participates in the multi-service program. The medical emergency evacuation procedure must be approved by the cognizant OCMI.

(b) The medical emergency evacuation procedures must include the procedures for segregating the injured/sick crewmembers until emergency evacuation can be affected.

(c) The vessel must have resources necessary to adequately respond to crew medical emergencies including evacuations of a sick or injured crewmember.

(d) The OCMI shall place a permanent note in each affected vessel's file indicating that the vessel is prohibited from engaging in any international voyages until a hospital space meeting the requirements of 46 CFR 92.20-35 is provided on the vessel.

k. Streamlined Inspection Program (SIP): A vessel's status as a multi-service vessel does not necessarily invalidate the opportunity for a vessel to remain or participate in SIP. However, vessels that have undergone a major conversion as defined by the Marine Safety Center (MSC), and as a result of retrofitting for the purposes of being certified as multi-service, the local OCMI will make the determination if the vessel will remain in the SIP.

l. Alternative Compliance Program (ACP): Currently, vessels inspected under 46 CFR Subchapter I are allowed to participate in the Alternative Compliance Program (ACP) while OSVs inspected under 46 CFR Subchapter L are not. The regulations at 46 CFR 8.400 through 8.450 and Change 1 to NVIC 2-95, "U.S. Coast Guard's Alternative Compliance Program," describe procedures for accepting certain plan review, and inspection functions performed by recognized classification societies. Regulations are expected to be proposed in the next few months to allow OSVs inspected under 46 CFR Subchapter L to participate in the ACP. After these regulations are finalized, plan review and inspection of multi-service vessels (under 46 CFR Subchapters I and L) may be conducted under the provisions of the ACP.

m. Keel Cooler attachment to the hull: Subchapter L allows keel coolers to be attached to the hull with fillet welds while Subchapter I and Subchapter F require keel coolers to be attached by using full penetration welds. Keel coolers may be attached to the hull using the Subchapter L standard (fillet welds) for OSVs operating under multi-service certification as a cargo and miscellaneous vessel with the following restrictions:

(1) The vessel must be designed to survive flooding of the space where the keel coolers pass through the hull plate. Only one compartment flooding need be considered at any one time, but the worst case scenario must be analyzed for compliance with the damage stability standards required by Subchapter L; or

(2) If a keel cooler penetrates the hull in a compartment that is not normally considered for, or cannot pass the damage stability required for Subchapter L, isolation valves must be installed at or near each shell penetration. Each isolation valve must be easily accessible.

4. Operational requirements:

a. Manning: The fundamental manning difference between OSVs and freight and industrial vessels is that OSVs are allowed to use a "two-watch system" when engaged on a voyage of less than 600 miles (46 USC 8104(g)). Towing vessels are also allowed to use a two-watch system when engaged on a voyage of less than 600 miles. With limited exceptions, other seagoing merchant vessels over 100 GT (including freight and industrial vessels) are required to use a three-watch system when at sea (46 USC 8104(d)). Thus, multi-service vessel COIs will have to be structured such that appropriate manning is specified for different vessel services and voyage lengths. The local OCMI is responsible for determining acceptable manning levels for vessels inspected in their respective OCMI zones. Recommended COI endorsements (VFODs) for

manning under various operating conditions are included in enclosure (3). A discussion of deck and engine department manning on multi-service vessels is provided below.

(1) Deck Department Manning General: The recommended manning scales provided in Volume III of the Marine Safety Manual may be used as a general basis for deck department manning for multi-service vessels operating as OSVs, freight, industrial or towing vessels. The prescribed manning will vary, particularly between OSV and the other vessel services (freight, industrial, and towing). Under 46 USC, OSVs have been granted special treatment for deck (and engine) department manning. However, when a multi-service vessel is not operating as an OSV, it will be required to meet the generally higher manning requirements of the applicable service. The deck manning for licensed individuals is taken from the requirements of 46 USC 8301. The number of Able and Ordinary Seamen (AB and OS) will vary depending upon the OCMI's evaluation of the vessel and her operations.

(a) Deck Officers on Mechanically propelled vessels other than OSVs

(1) A licensed master is required on every vessel subject to Coast Guard inspection (46 USC 8301(a)(1)).

(2) Three licensed mates are required on each vessel over 1000 GT (Regulatory Tonnage) per 46 USC 8301(a)(2). This statute provides for establishment of an alternate tonnage under Convention Measurement rules (46 USC 14302) if prescribed by interpretive regulation by the Secretary under 46 USC 14104. An alternate tonnage has not yet been established for this statute. Until alternate tonnage equivalencies are established, multi-service vessels that measure over 1000 GT under any tonnage measurement system must have three licensed mates (in addition to the master). On voyages of less than 400 miles this requirement may be reduced to two licensed mates (46 USC 8301(a)(2)(A)).

(3) Two licensed mates are required on each vessel that measures between 200 and 1000 GT (Regulatory Tonnage). An alternate Convention Measurement tonnage is authorized but has not been established (46 USC 8301(a)(3)).

(4) One licensed mate is required on vessels between 100 and 200 GT (Regulatory Tonnage). An alternate Convention Measurement tonnage is authorized but has not been established (46 USC 8301(a)(4)).

(b) Deck Officers on Offshore Supply Vessels:

(1) A licensed master is required on every vessel subject to Coast Guard inspection (46 USC 8301(a)(1)).

(2) OSVs on a voyage of more than 600 miles must have a master and two licensed mates (46 USC 8301(b)). There is no tonnage limitation to this rule other than the general requirement that an OSV is less than 500 GT (Regulatory Tonnage) or 6000 GT (ITC).

(3) OSVs on a voyage of less than 600 miles must have a master and one licensed mate (46 USC 8301(b)).

(c) Unlicensed Deck Personnel:

(1) General: Neither 46 USC nor the corresponding regulations prescribe the number of unlicensed Able Seamen or Ordinary Seamen to be carried aboard particular categories of vessels. This decision is left to the discretion of the OCMI following an evaluation of the vessel and her intended operations. The OCMI is responsible for ensuring that the vessel can be safely operated with her assigned complement of officers and crew.

(2) Historical Manning of Deck Crew: A review of numerous existing OSV and small cargo and miscellaneous vessel COIs has revealed that many OCMIs have required one unlicensed member of the deck department to be on duty for each watch aboard the vessel. Thus, for a three-watch system many OCMIs have required two Able Seamen and one Ordinary Seaman. For such vessels, the deck department consists of one licensed officer and one unlicensed crew member on duty together for each watch. For OSVs and towing vessels authorized a two watch system on voyages of less than 600 miles, the unlicensed deck personnel are typically reduced to one Able Seaman and one Ordinary Seaman. The following statutory provisions must also be complied with in establishing deck crew manning:

[a] Three-watch system: At least 65 percent of the unlicensed deck crew must be rated as Able Seaman on vessels with a three-watch system (46 USC 8702(b)(2)).

[b] Two-watch system: At least 50 percent of the unlicensed deck crew must be rated as Able Seaman on vessels with a two-watch system (46 USC 8702(b)(2)(i)).

(2) Engine Department Manning General: All of the discussion below is predicated on the fact that the vessels under consideration are of OSV size and are under 500 GT Regulatory tonnage or 6,000 GT ITC tonnage.

(a) Engine Department Manning Considerations: The manning level described below assumes that at least two individuals (one licensed engineer and one Oiler) is appropriate for each watch on a vessel with no or limited automation. Typically, for a vessel that meets the requirements for "minimally attended," one licensed engineer is appropriate for each watch. For a periodically unattended engineroom, one Chief Engineer and one Assistant Engineer should be considered as the "base case" engine department manning. The OCMI should consider the guidance in Volume III, Chapter 25 "Manning Requirements for Automated Vessels" in establishing the required manning for a periodically unattended engineroom. The OCMI must be satisfied that the proposed engine department personnel will be satisfactory to operate the vessel's engineering equipment on a continuing basis.

(b) Engineering Manning (Cargo & Miscellaneous Vessle Services): The following engine department manning levels have been developed as a general guideline for OCMIs. The recommended engineroom manning for a multi-service vessel operating in one of the cargo and miscellaneous vessel services (e.g. freight, industrial or towing) is shown below. The various

manning levels are based upon the level of engineroom automation and are also dependent upon the OCMI's evaluation of the vessel and crew.

(1) Fully manned: 1 Chief Engineer, 2 Asst Engineers, 3 oilers

(2) Minimally attended: 1 Chief Engineer, 2 Asst Engineers

(3) Periodically unattended: 1 Chief Engineer, 1 Asst. Engineer*

* Provided the OCMI has reviewed, accepted and verified the vessel automation as well as the crew's ability to maintain the vessel and perform all required evolutions.

(c) Engineering Manning for OSV Service: 46 USC 8301(b) requires a licensed engineer on each OSV over 200 GT (Regulatory tonnage). No specific number of unlicensed engine department personnel is required on an OSV by law or regulation. OCMIs have the authority to require additional engine department personnel (either licensed or unlicensed) but must base this requirement on information that these increases are necessary to insure safety. Volume III of the Marine Safety Manual provides a sample manning scale for OSVs that includes three designated duty engineers and three oilers on voyages over 600 miles or; two designated duty engineers and two oilers on voyages less than 600 miles. This recommended manning level is contingent upon the level of engine automation.

(d) Historical Manning of OSV Engine Department: A review of a number of OSV COIs reveals that many Eighth District OCMIs have limited required engine department personnel to a single Chief Engineer on OSVs over 200 GT. Presumably, this has been done based upon a review of engine automation, reliability and engine department workload. Thus, for many existing OSVs the designated engine department manning is one Chief Engineer. This manning level is not an absolute. Future workload and/or fatigue studies may be needed to verify proper OSV engine department manning, particularly considering the increasing size, complexity, operational requirements and endurance of these vessels.

(3) Requests for reduced engineroom manning: The OCMI shall consider all requests for reductions in engineroom manning. Acceptance by the Coast Guard of automated systems to replace specific crew members or to reduce overall requirements for crew members depends on the capabilities of the automated system; as well as the combination of crew members, equipment, and systems necessary to ensure safety of the vessel, personnel, and environment.

(a) Each vessel operating condition should be considered including maneuvering; the ability of the crew members to perform each operational evolution, including to cope with emergencies such as fire and the failure of control or monitoring systems. In addition, the OCMI should consider the role of the vessel's crew in conducting a planned maintenance program with regular testing procedures; as well as the automated system's demonstrated reliability during its initial trail period (usually 3000 hrs) and its continued reliability.

(b) The OCMI shall consider all relevant information in determining a reduction in crew size to ensure there is no adverse effect on safety. A review of automated vessel experiences show varying degrees of reliability in engineering automation. Accordingly, manning reductions in the engine department will be made only after a system has operated for a sufficient period of time to demonstrate its reliability, as well as the crew's ability to maintain the vessel and perform all required evolutions. The duration of the trial period shall normally be 3000 hours (based upon underway time).

b. Log entries regarding service: Any vessel operating as a multi-service vessel is required to have the type of service entered into the vessel's log book or record. Although an official logbook is not required for all OSVs or cargo and miscellaneous vessels operating in domestic service, 46 CFR Subchapter L requires that an OSV without an official logbook have an unofficial log or record (46 CFR 131.610). This entry shall be made each time the vessel changes service. The master is to ensure that the service of the vessel (either freight or OSV) is officially noted in the vessel's logbook or record. This requirement should be entered into the conditions of operation on the vessel's COI.

c. Bulk Liquid Cargo: COIs should indicate that when a vessel is in freight industrial or towing vessel service, the vessel is prohibited from transferring bulk liquid cargoes to other vessels or offshore facilities. Additionally, a multi-service certified vessel when operating as a freight, industrial or towing vessel may carry bulk liquid cargoes provided:

(1) it meets the applicable double hull requirements of 33 CFR 157.10(d)

(2) the bulk liquids have an aggregate volume of not more than 20% of the vessel's deadweight tonnage (DWT), and

(a) For Freight vessels:

[1] Grades D & E cargoes may be carried in integral tanks

[2] Certain Grade C cargo and Grades D & E cargoes may only be carried in portable tanks per 46 CFR 98.30

(b) For Industrial vessels:

[1] Grades D & E cargoes may be carried in integral tanks

[2] Grades D & E and specifically named Grade C cargoes may be carried in portable tanks per 46 CFR 98.30

Engineering Automation Considerations

1. This enclosure was developed to highlight some of the more significant engineering automation differences between 46 CFR Subchapter L (OSVs), 46 CFR Subchapter F (Marine Engineering) and SOLAS. This enclosure will undoubtedly become obsolete over time as changes to Coast Guard regulations and SOLAS occur. Applicable Coast Guard regulations and SOLAS requirements will always prevail. This enclosure should **NOT** be used alone, as it is only intended to point out some of the more significant engineering automation differences between 46 CFR Subchapter L, 46 CFR Subchapter I and SOLAS.

2. **Offshore Supply Vessel (L)**

a. Qualitative Failure Analysis (QFA) and Design Verification Testing Procedure (DVTP) are required for the remote or automatic propulsion controls.

b. Single non-concurrent failure of each easily replaceable component of the propulsion automatic or remote controls must not cause the propulsion engine, or the pitch of the propeller, to increase. Alternative manual means of propulsion control is required.

c. Propulsion control in the pilothouse is required.

d. Required alarms are very limited, and are only required for unattended machinery spaces.

e. Test procedures (periodic safety test procedures) and operations manual are required only for unattended machinery spaces.

f. For unattended machinery spaces, machinery displays (instrumentation) are required to be grouped or centralized in the machinery space.

3. **Sub I Vessel (>500 GT)**

a. A QFA is required for the automated systems listed in 46 CFR 62.20-3(b). Whenever a QFA is required, a DVTP document is also required.

b. Propulsion control failures are required to be failsafe, i.e., speed and direction of thrust maintained, until local manual or alternate manual control is in operation. Failures are required to be alarmed in the navigating bridge and the machinery spaces. NOTE: Credit is given to vessels with “independent duplicate propulsion systems”, i.e., a vessel with multiple propellers with independent controls, do not have to maintain the speed and direction of thrust of the affected propulsion plant, provided the reduced propulsion capability of the vessel using the remaining propulsion plant(s) is not below that necessary for the vessel to run ahead at 7 knots or half speed, whichever is less, and is adequate to maintain control of the ship.

c. Propulsion controls in the pilothouse are not required for a vessel with a fully-manned machinery plant operation, implying propulsion control in the machinery spaces is required.

d. If pilothouse control is provided, a means to pass propulsion orders (EOT) between the navigating bridge and the engineroom is required. Normal propulsion control transfers require acknowledgement from the receiving station. Control location transfer between control stations required. Engine control room station must have means to take propulsion control from the navigating bridge or any other secondary control stations at any time. Local manual control must have the capability to override all remote and automatic control locations.

e. Two sources of power are required for all primary control, safety control, instrumentation and alarm systems. One source must be from the emergency power source. Alarms are required to be continuously powered (typically provided by UPS or batteries.)

f. **Additional requirements for <u>fully manned machinery spaces (46 CFR 62.30 and 62.35)</u>**. This is NOT a comprehensive list.

(1) Primary closed loop propulsion control systems must be independent and physically separate from required safety control, alarm or instrumentation sensors.

(2) Propulsion machinery automatic safety trip control is required if continued operation could result in serious damage, complete breakdown, or explosion of the equipment.

(3) Remote controls for flooding safety equipment must remain functional under flooding conditions.

(4) Fire pump remote controls must include a firemain pressure indicator or firemain low pressure alarm.

(5) Automatically filled fuel oil day tanks, settlers, and similar fuel oil service tanks that are filled automatically or by remote control must have high level alarm that annunciates in the machinery spaces, and an automatic fuel-fill shutdown control system or overflow arrangement.

(6) Starting capacities for main engines and ship's service generator prime movers require a certain number of consecutive starts, depending on type of starting system and propulsion engine.

g. **Additional requirements for <u>minimally attended</u> machinery plant operation (46 CFR 62.50-20).** This is NOT a comprehensive list.

(1) ECC must include control and monitoring of:

(a) propulsion plant, propulsion auxiliaries,

(b) electrical power generation,

(c) machinery space fire pump,

(d) bilge pump control to counter machinery space flooding, and

(e) the ability to place on-line the required standby systems (unless systems are automatically controlled) and to shutdown such equipment when necessary.

(f) Minimum alarms and instrumentation are specified in 46 CFR Table 62.35-50.

(2) Personnel alarm (dead-man alarm) required.

(3) Machinery space fire alarms must activate alarms throughout the machinery spaces and engineers' accommodations. The fire alarms in the ECC and navigating bridge must visually indicate which machinery space is on fire.

(4) Watertight doors in required subdivision bulkheads must be Class 3 watertight doors, and must be controlled from the ECC and navigating bridge.

(5) Controls of sea inlet and discharge valves, and the emergency bilge suction, must be located and arranged to allow time for operation in the event of flooding. Time consideration in the proper location of the valve operators, must include flooding detection, crew response and valve control operation time.

(6) Engineers' call system (operable from the ECC) required.

(7) ECC must have controls and instrumentation necessary to place the ship's service and propulsion generators in service in 30 seconds.

(8) Switchboard distribution, propulsion and generator controls must be located in the ECC, or additional requirements apply if located outside the ECC.

(9) Maintenance program required.

h. **Additional requirements <u>for periodically unattended machinery plant</u> operation (46 CFR 62.50-30)**. This is NOT a comprehensive list.:

(1) Required redundant vital auxiliaries and power sources must automatically transfer to the back-up unit upon failure of the operating units.

(2) Capacity of fuel oil service tanks to be determined by the OCMI, depending on the route of the vessel, otherwise, must be sufficient for 24-hour operation at normal power, 8 hours for automatically filled tanks. Low fuel oil level alarm is required.

(3) Starting system receivers, accumulators or batteries must be automatically and continuously charged.

(4) Engineer's assistance needed alarm must be activated when the alarm system normal source of supply fails, and when an alarm at the ECC is not acknowledged within a period of time where an engineer is expected to respond to the alarm.

(5) ECC alarms that require immediate attention of the navigating bridge officer for the safe navigation of the vessel must be extended to the pilothouse.

(6) All required ECC alarms must be extended in the engineers' accommodations. This may be in the form of a summary alarm.

(7) Fire and flooding alarms must not be summarized.

(8) A fire control station is required. The station must be outside the machinery spaces.

(9) Daily check-off list must be completed prior to leaving the machinery plant unattended.

(10) Standby ship's service generator must automatically start and assume the ship's service loads within 30 seconds to permit propulsion and steering, and to ensure the safety of the vessel, and automatic restarting of essential auxiliaries. The emergency generator is not considered for this purpose. See item 4.e.(4) below under SOLAS which allows the administration to dispense with the continuity of power requirements outlined in this paragraph for vessels of less than 1600 gross tons.

(11) If ship's service power is supplied by more than one generator in parallel operation, provisions to prevent overload of the remaining generator to ensure the remaining generator are kept in operation to permit propulsion and steering, and to ensure the safety of the vessel.

4. **SOLAS**

a. Contains no provisions to verify compliance with the failsafe regulations.

b. Same as Paragraph 3.b (above), for Subchapter I vessels, except the NOTE does not apply for SOLAS vessels.

c. Propulsion controls required in the navigating bridge for periodically unattended machinery plant operation.

d. Provisions for continuous manual supervision from a control room is similar to a minimally manned machinery plant operation for Sub I vessels, Paragraph 3(g), above.

e. Additional requirements for **periodically unattended machinery spaces**:

(1) Crankcase oil mist detectors or bearing engine temperature monitors or similar devices are required for internal combustion engines of 2250kW and above or

having cylinders of at least 300 mm bore. As per D8(m) Policy Letter 05-2001: It has been determined by G-MSE that high crankcase pressure switches are an equivalent to oil mist detectors, required by SOLAS II-1/47.2, on medium sized (900 to 5000hp) Electro-Motive Division (EMD) General Motors Corp two cycle engines. The difference between the two systems is that the detector senses misted oil and a high crankcase pressure switch senses the loss of a vacuum in the crankcase. The intent of both systems is to prevent the occurrence of a crankcase fire as a result of a mechanical engine failure by signaling an alarm and /or shutting down the engine.

(2) The number of consecutive automatic starts of propulsion machinery must be limited and alarmed. The low starting air pressure alarm must be set at a level to permit starting operations of the propulsion machinery locally. This typically applies to reversible main engines.

(3) SOLAS II-2/14 Fixed fire detection and fire alarm systems for periodically unattended machinery spaces. A fixed fire detection system and fire alarm system of an approved type in accordance with the relevant provisions of regulation 13 shall be installed. Another area of concern is regulation 14.2 which states; except in spaces of restricted height and where their use is specially appropriate, detection systems using only thermal detectors shall not be permitted.

(4) The administration may dispense with the continuity of power requirements outlined in paragraph 3.h.(10) above for vessels of less than 1600 gross tons.

SAMPLE MILTI-SERVICE VESSEL COI ENDORSEMENT

The paragraphs below describe the sample manning and operational endorsements that might be found on the Certificate of Inspection of a vessel authorizing service as both an OSV and one or more cargo and miscellaneous vessel services under 46 CFR Subchapter I. It is not expected that the sample endorsements below represent a comprehensive list of manning and operational COI endorsements. However, this list was developed to provide OCMIs guidance in preparing COI endorsements for multi-service vessel operations.

FREIGHT (TOWING OR INDUSTRIAL) VESSEL SAMPLE MANNING

For vessels that either have no or some degree of basic automation:

1 MASTER
2* LICENSED MATES
2 ABLE SEAMEN
1 ORDINARY SEAMAN

1 CHIEF ENGINEER
2 LICENSED ENGINEERS
3 OILERS

For vessels that have automation fully complying with 46 CFR 61.40 and 62.01 through 62.35 and meeting the intent of 62.50-20 for a minimally attended engine room as determined by the Cognizant OCMI :

1 MASTER
2* LICENSED MATES
2 ABLE SEAMEN
1 ORDINARY SEAMAN

1 CHIEF ENGINEER
2 LICENSED ENGINEERS

For vessels that have automation fully complying with 46 CFR 61.40 and 62.01 through 62.35 and meeting the intent of 62.50-30 for a periodically unattended engine room as determined by the Cognizant OCMI:

1 MASTER
2* LICENSED MATES
2 ABLE SEAMEN
1 ORDINARY SEAMAN

1 CHIEF ENGINEER**
1 LICENSED ENGINEER**

* If vessel is over 1000 GT, must provide 3 Licensed mates for voyages 400 miles or more in length.

** Provided the OCMI has reviewed, accepted and verified the vessel automation. Manning reductions in the engine department will be made only after a system has operated for a sufficient period of time to demonstrate its reliability, as well as the crew's ability to maintain the vessel and perform all required evolutions.

OCEANS

THIS VESSEL HAS BEEN INSPECTED AND APPROVED FOR MULTI-SERVICE EMPLOYMENT AS AN OFFSHORE SUPPLY VESSEL (OSV), FREIGHTSHIP, TOWING VESSEL OR INDUSTRIAL VESSEL, UNDER THE PROVISIONS OF D8 POLICY LETTER 09-2001. IT MUST CONFORM AT ALL TIMES TO THE MOST STRINGENT DESIGN AND EQUIPMENT STANDARDS OF EITHER SUBCHAPTER L, I, OR SOLAS REGARDLESS OF THE SERVICE IN WHICH IT IS ENGAGED. THE MASTER IS REQUIRED TO RECORD THE TYPE OF SERVICE IN THE VESSEL'S LOGBOOK WHEN THE VESSEL'S SERVICE HAS CHANGED.

THE SPECIFIED MANNING LEVEL IS CONTINGENT UPON THE PROPER OPERATION OF THE ENGINEERING AUTOMATED CONTROL/MONITORING SYSTEMS. ANY MAJOR ALTERATION OR ESSENTIAL COMPONENT FAILURE MUST BE REPORTED IMMEDIATELY TO THE COGNIZANT OFFICER IN CHARGE MARINE INSPECTION.

IMMERSION SUITS ARE NOT REQUIRED WHEN THE VESSEL IS OPERATING IN THE ATLANTIC OCEAN BETWEEN 32 DEGREES NORTH AND 32 DEGREES SOUTH LATITUDE OR ANY OTHER WATERS BETWEEN 35 DEGREES NORTH AND 35 DEGREES SOUTH LATITUDES.

OFFSHORE SUPPLY VESSEL

THE FOLLOWING OPERATING CONDITIONS APPLY WHILE THE VESSEL IS OPERATING AS AN OFFSHORE SUPPLY VESSEL, AS DEFINED BY 46 U.S.C. 2101(19), ENGAGED IN THE SUPPORT OF EXPLORATION, EXPLOITATION, OR PRODUCTION OF OFFSHORE MINERAL AND OIL INDUSTRY RESOURCES.

VESSEL IS PROHIBITED FORM DISCHARGING NOXIOUS LIQUID SUBSTANCE RESIDUE TO THE SEA.

WHILE ENGAGED IN SUPPORT OF EXPLORATION, EXPLOITATION, OR PRODUCTION OF OFFSHORE MINERAL OR ENERGY RESOURCES VESSEL MANNING MAY BE REDUCED AS FOLLOWS:

1 MASTER
2 LICENSED MATES
2 ABLE SEAMEN
1 ORDINARY SEAMAN
1 CHIEF ENGINEER

IN ADDITION, THE VESSEL MAY CARRY XX OTHER PERSONS IN THE CREW, YY PERSONS IN ADDITION TO CREW, AND ZZ OFFSHORE WORKERS.

WHEN THE VESSEL IS OPERATING AS AN OSV AND IS ON A VOYAGE OF LESS THAN 600 MILES, THE MANNING MAY BE REDUCED BY 1 LICENSED MATE AND 1 ABLE SEAMAN. CONCURRENTLY, ZZ OFFSHORE WORKERS MAY BE CARRIED.

TOWING VESSEL

WHEN THE VESSEL IS OPERATING AS A TOWING VESSEL AND IS ON A VOYAGE OF LESS THAN 600 MILES, THE MANNING MAY BE REDUCED BY 1 LICENSED MATE AND 1 ABLE SEAMAN.

*** FREIGHT (TOWING OR INDUSTRIAL) VESSEL***

THE FOLLOWING OPERATING CONDITIONS APPLY WHILE OPERATING AS A FREIGHT (TOWING OR INDUSTRIAL) VESSEL.

THIS VESSEL DOES NOT MEET THE U.S. DOUBLE HULL DESIGN STANDARDS OF 33 C.F.R. 157.10(d) AND MAY NOT CARRY OIL, AS DEFINED BY 33 CFR 157.03, IN BULK IN INTEGRAL TANKS.

WHEN OPERATING AS A FREIGHT (TOWING OR INDUSTRIAL) VESSEL, THE DISCHARGE OF FUEL OIL, PETROLEUM BASED DRILLING FLUIDS, OR OTHER COMBUSTIBLE LIQUID TO A PLATFORM, FACILITY, MODU, OR OTHER VESSEL IS PROHIBITED.

COMPARISON TABLE: 46 CFR SUBCHAPTER L, I & SOLAS

Issue	Subchapter L	Subchapter I	SOLAS
1. Double Hull require-ments per OPA 90	OSVs exempt per 46 USC 3702(b)	Must have double hull for cargo tanks containing OPA cargoes	No requirements for double hull if considered "other than an oil tanker" with cargo tanks coming under regulation 2(2) of Annex I MARPOL
2. Bulk Cargo	May discharge bulk liquid cargoes to another vessel Unlimited amounts of excess fuel as cargo Grade D and E cargoes limited to 20 % of DWT except may carry Grade D & E drilling fluids without limit (46 CFR 125.110) Grade B cargo limited to 20% DWT and may only be carried in fixed independent tanks on deck. May carry hazardous materials in portable tanks in accordance with 46 CFR 98.30 May carry NLS per 46 CFR 125.120	May not discharge bulk liquid cargoes to another vessel No provisions for excess fuel as cargo except as part of the limited quantities of Grade D & E mentioned below May carry limited quantities (20% DWT) as follows (46 CFR 90.05-35: *a. Cargo vessels:* Grades D & E cargoes in integral tanks. Certain Grade C cargo and Grades D & E cargoes in portable tanks IAW 46 CFR 98.30 *b. Industrial vessels:* Grades B & lower cargoes in fixed independent or integral tanks authorized by CMDT. Grades D & E and specifically named Grade C cargoes in portable tanks per 46 CFR 98.30 NLS not addressed	Silent Silent Vessels carrying 200m^3 or more in oil cargo must meet MARPOL Annex I Regulations 9,10,14,15(1),(2), (3), 18, 20, and 24(4) in addition to normal requirements for cargo vessels. NLS carriage per MARPOL Annex II
3. Primary Lifesaving	100% aggregate required	100% required each side	100% required each side
4. Structural Fire Protection	Minimal. See 46 CFR 127.220	46 CFR 92.07 applies if Vessel > 300GT and carries >12 industrial personnel	SOLAS CH II-2 Part C applies NVIC 10-99 (Interpretations of SOLAS II-2) should be consulted for recent interpretations of SOLAS fire protection requirements

Issue	Subchapter L	Subchapter I	SOLAS
5. Fire Protection	Fixed gaseous systems required for paint lockers only (with exceptions for size and location); no requirements for spaces containing internal combustion engines.	No exceptions for paint lockers. If vessel >1000 GT, spaces containing internal combustion engines must have fixed gaseous systems.	Spaces containing internal combustion engines required to have fixed system plus set of portable air-foam equipment.
	Only 1 fire pump required	Only 1 fire pump required	2 Fire pumps required with sufficient firemain diameter to convey max required discharge from both fire pumps operating simultaneously or 616 GPM.
	1 1/2 inch hoses at all interior and exterior fire hydrants	1 1/2 inch hoses for interior spaces, 2 1/2 inch hoses for exterior hydrants. [1]	No diameter hose specified as long as output/performance satisfied.
	Halon 1211, 1301 and mixtures for BI, BII, CI, CII portable extinguishers	Halon not allowed for portable fire extinguishers	Halon allowed only in machinery spaces, pump rooms, vehicle (cargo) spaces. NVIC 10-99 (Interpretations of SOLAS II-2) should be consulted for recent interpretations of SOLAS fire protection requirements
6. Fire Detection	Required for unattended machinery spaces	Required in machinery spaces designed to be minimally attended and periodically unattended.	Required for unattended machinery spaces and in accommodation spaces and/or escape routes contingent upon the method of SFP.
7. Electrical NOTE: Compliance w/Sub J is required for items not specifically addressed in Sub. L. The following compares differences in the items specifically addressed in Sub L	For OSVs 19.8m (65 ft) or less in length, the Alternative Standards listed in 46 CFR 129.120 are acceptable	Must meet Sub J	In general, vessel meeting Sub I and Sub J, meets SOLAS with the exception of Fire Detection (see above).

[1] Exterior stations may be outfitted with siamese 1 1/2 inch hoses as long as pump capacity and performance is based on 2 1/2 inch outlet

Issue	Subchapter L	Subchapter I	SOLAS
Power Sources	• Vital systems identified in 46 CFR 128.130(a) and loads identified in 46 CFR 129.310(a)(1) (ii) -(v) must be arranged so that they can be energized from 2 sources of electricity. (e.g. a generator, or an alternator driven by a propulsion engine, in combination with a battery having sufficient capacity to supply the loads above for 3 hours, is an acceptable 2 source system). • Vessel 100 GT and over must have 2 power generating sets, one of which may be propulsion driven.	**Normal**: Each ship service generator required to have sufficient capacity to supply vsl's service loads (defined in 46 CFR 111.10-1)	**Normal**: Same as I
	Emergency: source not required. Vessels < 100 GT must have emergency lighting along line of escape to the main deck from accommodations or working (machinery) spaces below main deck	**Emergency**: Source required, for emergency loads in 46 CFR 112.15.5 and capacity sufficient for period of operation in Table 46 CFR 112.05-5(a)	**Emergency**: Self contained emergency power source required with period of operation dependent on loads required. (See SOLAS Chap II-1, Regulation 43.)
Cable	UL listed cable allowed	Use of boat cable not addressed	Flame retardant but no specific requirements
Steering gear	Orbitrol system allowed although not considered a full follow-up control system. Credit given to vessels with multiple-screw propulsion if capable of steering vessel.	Power driven main steering gear must have full follow-up control of the rudder.	Main steering gear must provide rudder rate of 28 secs from 35 to 30 degrees of rudder movement, may use all power units to get max rate.
8. Stability	Intact: See 46 CFR 170.170 (weather) and 46 CFR 170.173 or 46 CFR 174.185(b)-(e)	Intact: See 46 CFR 170.170 (weather) and 46 CFR 170.173	Intact: same as CFR
	Damage: See 46 CFR174.200 and 174.205 if carrying more than 16 offshore workers	Damage: none required	Damage: SOLAS Chap II-1, Part B-1, applies if vessel >300 ft.

Issue	Subchapter L	Subchapter I	SOLAS
9. Automation QFA/DVT	Only required if unattended machinery space.	Required regardless of manning.	Not required.
Propulsion Controls	Failsafe state defined as "no increase in speed or thrust" must result when the remote prop control system fails. This allows complete engine shutdown if a failure of the remote prop control system occurs	Failsafe state defined as "speed and direction of thrust must remain as-is" upon failure of remote prop control system, until alternate means of control is established. Only partial reduction in prop capability is allowed, as long as 7 knots or half design speed can be maintained.	Same as I
Engine Order Telegraph	Not required	Required	Same as I
Independence	Independence of propulsion control, alarm and monitoring, and safety control systems not required.	Independence required. Single non-concurrent failures of major components within each system must not prevent sustained or restored operation of that system.	Independence not specifically addressed
Required alarms and monitoring	Minimal for diesel engines	Adopts ABS tabulated list	No tabulated list
Powering	Alarms not required to be continuously powered, but 2nd (emergency) power source required	Alarms required to be continuously powered, and 2nd (emergency) power source required	Same as I
Unattended machinery plants	No ECC required	ECC required	Same as I
	No fire control station	Fire control station required	Same as I
	No Ass't-Needed alarm	Ass't-Needed alarm required	No Ass't-Needed alarm
	No dead-man's alarm	Dead-man's alarm required	Same as I
	No sea valve control	Sea valve control required	Same as I
	No continuity of electrical power requirement	Continuity of electrical power requirement	Same as I
	Alarms extend to pilothouse	Alarms extend to pilothouse, ECC, & engineers' accommodations	Same as I
	Redundant vital auxiliaries not required	Auto transfer of redundant auxiliaries	Same as I
10. User Fee	$1470/year, $1260/year if vessel enrolled in alternate reinspection program	$1870/year	N/A

Issue	Subchapter L	Subchapter I	SOLAS
11. Manning	2 watch system using 1 mate, 1 master for voyages less than 600 miles. Voyages > 600 miles must have 2 mates plus master 46 USC 8301(b)	3 watch system. Required 3 mates if vessel > 1000GT, unless on voyage less than 400 miles in which case may reduce to 2 mates 46 USC 8301(a)(2)	Subject to Administration and STCW (same as I or L)
12. Hospital Space	None	Required by 92.20-35 if vessel makes voyages more than 3 days and carries 12 or more crew	Silent
13. Keel coolers	Allows attachment to hull using filet welds per 46 CFR 128.420	Attachment to hull must use full penetration welds per 46 CFR 56.50-96.	Silent
14. Stateroom capacity & size	For vessels >100GT: Max 4 persons/room for crew members @30 square feet/ person; Max 6 persons/room for offshore workers @ 20 square feet/person (46 CFR 127.280)	Max 4 persons/room for crew members @ 30 square feet/person. Where *practicable*, each licensed officer must be provided with a separate stateroom (46 CFR 92.20-20)	Silent…but ILO has standards similar to 46 CFR: **ILO 1970 (C133)** Art 5.2.a: for ratings: vessels 1000 GT - 3000 GT: 30 square feet/person , 3000 GT - 10,000 GT: 35 square feet/person. Max 2 persons per room**. ILO 1949 (C92)** Art. 10.4 Vessels < 800 GT… 20 square feet/person; 800 GT - <3000 GT: 25 square feet/person 3000 GT and up 30 square feet/person 1 officer per room if in charge of navigation or engineering watch. Other officers may be 2/room. Ratings may be 4/room

Enclosure (2): Oil Spill Response Vessel – Vessel of Opportunity (VOO) Letter Template

U.S. Department of Homeland Security

United States Coast Guard

Commander
United States Coast Guard
Unit Name

Address
City, State and Zip Code
Staff Symbol:
Phone:
Fax:
Email:

16712/WSE-SME
<DATE HERE>

Addressee Line 1
Addressee Line 2
Addressee Line 3

VESSEL OF OPPORTUNITY (VOO) LETTER

Dear Sir or Madam:

Your request for confirmation that the <VESSEL NAME (OFFICIAL NUMBER)> qualifies as a Vessel of Opportunity (VOO) within <INSERT ZONE>, is **approved.**

- This vessel(s) is normally and substantially engaged in other activities as a <INSERT ACTIVITIES> outside of oil spill response activities.
- This vessel(s) is not a vessel that carries oil as a primary cargo. The vessel(s) is/are prohibited from towing oil or hazardous materials in bulk.
- Per the National Defense Authorization Act for Fiscal Year 2023 (2023 NDAA), this vessel(s) is not subject to 46 CFR subchapter M towing vessel regulations while towing boom or oil spill response equipment for an oil spill response or while participating in an oil spill response exercise.
- When operating as a VOO, the minimum manning, if required, will be maintained pursuant to the requirements of 46 U.S.C. § 8104 and 46 CFR part 15. <INSERT REQUIREMENT IF THERE IS ONE>.
- In accordance with 46 U.S.C. § 8905, as an OSRV - VOO, this vessel is exempt from 46 U.S.C. § 8904, which requires a licensed individual for a towing vessel.
- Any time the vessel(s) is conducting any other commercial activity, other than those specified within the 2023 NDAA, they will be subject to inspection per 46 U.S.C. § 3301 and applicable regulations.
- Prior to participating in a spill response, ensure compliance with 29 CFR § 1910.120 - Hazardous Waste Operations And Emergency Response (HAZWOPER) training and safety requirements, unless the employer can demonstrate that the operation does not involve employee exposure or the reasonable possibility for employee exposure to safety or health hazards.

This VOO letter expires on <DATE HERE NOT TO EXCEED 5 -YEARS or FOR LENGTH OF WORK IF LESS>.

Should you have any questions regarding this letter, please to contact <NAME> at <PHONE NUMBER> or at <EMAIL>.

Sincerely,

<NAME>
<RANK>, U. S. Coast Guard
Captain of the Port
<UNIT NAME >