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16613/Egress
D8(m) Policy Ltr 05-2003
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MEMORADUM

From: D. R. Ryan
CCGD 8 (m)

To: Distribution

Subj: MEANS OF ESCAPE ON MANNED AND UNMANNED FIXED PLATFORMS

Ref: (a) Eighth District Instruction 16711.1, "Fixed Platform Inspection Program," dtd 14 MAR 97

1. **PURPOSE:** This policy letter is issued to provide policy clarification regarding egress requirements for fixed platforms in the Eighth District.

2. **DIRECTIVES AFFCTED:** This policy supercedes the guidance put forth in reference (a), specifically Part 1 (b) of enclosure (2) in reference (a), that indicates catwalks can only be considered as secondary means of escape.

3. **BACKGROUND:** On 09 June 2003, the Eighth Coast Guard District sent a letter to the Minerals Management Service describing this policy.

4. **DISCUSSION:**

a. Catwalks: 33CFR 143.101(c) requires all manned OCS facilities to be provided with at least two "primary means of escape" extending to the water, and 143.101(a) defines "primary means of escape" as fixed stairways or ladders of metal construction. For OCS facilities that are connected to adjacent OCS facilities by bridges, or "catwalks", which allow free access from one facility to another, the catwalk may serve as one of the primary means of escape provided:

(1) The catwalk leads to another location that provides a primary means of escape extending to the water, and

(2) There is a sufficient amount of primary lifesaving gear, per 33 CFR 144.01-1 or 144.01-15, at this alternate location to accommodate 100% of the personnel onboard the manned platform if they cross the catwalk and egress to the water via this alternate escape route.

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b. Single-Well Caissons: 33 CFR 143.101(d) requires unmanned OCS facilities to be provided with one primary means of escape and, when personnel are onboard, one secondary means of escape for every 10 persons onboard. In the case of small "single-well caisson" type platforms, the primary means of escape is usually a fixed ladder from the topside structure (work deck) to the waterline. Since the work deck on these platforms is typically very small, a worker cannot become trapped far from the primary escape route. If for some reason the ladder is not accessible, a reasonably safe alternative for emergency egress may be to jump into the water depending on the height from the work deck to the waterline. Furthermore, the risk to workers attending these facilities is quite low because there is usually very little processing equipment onboard, plus the limited frequency and duration in which personnel visit these facilities further lessens the risk. Taking all this into consideration, a single-well caisson type platform must have one primary means of escape but will not be required to have a secondary means of escape, even when workers are on the platform, provided:

(1) The work deck is no more than 20ft x 20ft (or 400 square feet) in size, and

(2) The work deck is no more than 20ft above mean low water.

5. **ACTION:** D8 OCMI's should make this policy available to owners and operators of offshore facilities within their area of responsibility.

6. **FEEDBACK:** Feedback or questions on this policy should be referred to the Eighth Coast Guard District, D8(m), at 504-589-6193

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