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16711/Hose Reels
D8(m) Policy Ltr 05-2004
17 September 2004

MEMORANDUM

From: R. W. BRANCH
CCGD8 (m)

To: Distribution

Subj: USE OF HOSE REELS WITH NON-COLLAPSIBLE HARD-RUBBER FIRE HOSES ON FLOATING OFFSHORE INSTALLATIONS

Ref: (a) 33 CFR 143.120 (b)
(b) 46 CFR 108.423
(c) 46 CFR 108.425

1. **PURPOSE:** This letter provides Eighth Coast Guard District (D8) guidance on the use of hose reels with non-collapsible hard-rubber hoses as a substitute for the required fire hoses described in 46 CFR 108.425 on board floating offshore installations (FOIs) operating within the jurisdiction of D8.

2. **DIRECTIVES AFFECTED:** This letter cancels and supersedes D8(m) Policy Ltr 04-2004.

3. **DISCUSSION:**

   a. The term "FOI" means a buoyant OCS facility securely and substantially moored so that it cannot be moved without a special effort. This term includes tension leg platforms, permanently moored semi-submersibles, and SPARs. It does not include mobile offshore drilling units and other vessels.

   b. Reference (a) requires FOIs to comply with the design and equipment requirements in 46 CFR Part 108 of the MODU regulations.

   c. Reference (b) requires a fire main system to have enough fire hydrants so that each accessible space may be sprayed with at least two spray patterns of water.

   d. Reference (c) requires fire hoses in a fire main system to be:

      (1) Of 1 ½ or 2 ½ inch nominal hose size diameter;

      (2) Of 50 foot nominal hose size length; and

      (3) Lined commercial fire hose that meets Standard 19 of the Underwriter's Laboratories, Inc. (UL-19).

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e. Commandant (G-MSE-4) has approved certain hose reels for limited use on board FOIs. These hose reels are required to be outfitted with non-collapsible hard-rubber hoses that meet Standard 92 of the Underwriter's Laboratories, Inc. or Military Specification H24580. These hose reels are also typically offered in lengths greater than 50 feet.

4. **ACTION:**

a. Hose reels with Coast Guard approved non-collapsible hard-rubber hoses may be used on board FOIs as a substitute to the required collapsible fire hose, subject to the following conditions:

(1) They may be installed only on open decks; or inside columns, pontoons, and machinery spaces as long as the area is not congested and the hose can be readily unreeled. An on-site verification must be conducted by a Coast Guard marine inspector.

(2) Hydrants with collapsible "UL-19" hoses should be installed inside the accommodation spaces for immediate access by the crew. However, if there are no fire hydrants installed inside the accommodation spaces, all of the following conditions must be met:

(i) The accommodation module cannot be longer than 70 feet in length and 40 feet in width. These dimensions are based on a review of existing accommodation modules, which are already installed on board FOIs, and an analysis that present arrangements can comply with the "coverage" requirements of paragraph 4.b. These dimensions may further be limited based on the "coverage" requirements of paragraph 4.b. if there are obstructions (hallways and secondary rooms) inside the accommodation module. An on-site verification must be conducted by a Coast Guard marine inspector.

(ii) Coast Guard marine inspectors, during each annual inspection, shall randomly select permanently-assigned FOI personnel not normally part of a fire fighting team, and verify that they are familiar with the location of all fire fighting equipment, specifically the location of the external hose stations that are to be used for internal spaces.

b. All fire hydrants (with collapsible or non-collapsible hoses) must meet the following "coverage" requirements as per reference (b):

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(1) Each accessible space must be sprayed with at least two effective spray patterns of water from separate hydrants.

(2) In all internal and external spaces, other than the main machinery space, at least one spray pattern of water must be from a single length (50 feet) hose. If the hose is over 50 feet in length, then only the first 50 feet of one hose at the hydrant may be used for determining coverage. The length of the second hose is unrestricted, as long as a minimum nozzle pressure of 50 psi can be provided with both hoses flowing.

(3) In the main machinery space, both spray patterns of water must be from a single length (50 feet) hose. If the hose is over 50 feet in length, then only the first 50 feet of one hose at the hydrant may be used for determining coverage.

(4) NVIC 6-72 allows for an effective spray pattern range of about 20-25 feet in still air.

c. The layout of the deck or the space must be taken into account for adequate coverage determination. Obstructions such as equipment, doorways, and stairways may limit a hose from being fully deployed.

d. Deck-to-deck hose coverage is permitted along the normal walking path of the stairways with consideration given to the bending radius of a charged hose. The passing of hoses deck-to-deck through other openings will not be credited for the allowable coverage.

e. Hose reels with non-collapsible hard-rubber hoses that do not meet Standard 92 of the Underwriter's Laboratories, Inc. or Military Specification H24580 currently installed on board existing FOIs, must obtain specific approval from G-MSE-4 or be replaced with approved hoses no later than two years from the date of this policy letter. Replacement of only the non-approved fire hoses is acceptable. Replacement of the whole firefighting system with its appurtenances is not required. However, the nozzles must be Coast Guard approved and compatible with the system. The type of nozzle to be installed can normally be found on the Coast Guard type-approval certificate for the hose.

f. D8 OCMIs are encouraged to distribute this policy letter to FOI owners and operators within their area of responsibility to ensure that they comply with this guidance.

5. **FEEDBACK:** Questions on this policy should be referred to the Eighth Coast Guard District, D8(m), at 504-589-2455.

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Dist: All Eighth District MSOs & MSUs