



: 16000.6
20 October 1997

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: MARINE SAFETY AND ENVIRONMENTAL PROTECTION CONFINED SPACE
ENTRY POLICY

Ref: (a) Commandant (G-MSO) ltr 16000.6 dtd 22 Sep 1997
(b) CCGD8 Standard Operating Procedures, Chapter 33

1. Reference (a) forwarded a draft Marine Safety and Environmental Protection Confined Space Entry Policy for your consideration and comment. Please submit your comments via this office not later than 21 November 1997. We will consolidate your comments and forward them to Commandant (G-MSO) by the 1 December 1997 deadline.
2. Please note that reference (a) designates the Eighth District to field test the draft confined space entry policy. Commanding Officers are encouraged to conduct training on the procedures specified in reference (a) as soon as possible and implement those provisions consistent with your command policy on confined space entry. Early next calendar year, we plan to solicit any additional observations you may have developed regarding use of this draft policy.
3. The draft Marine Safety and Environmental Protection Confined Space Entry Policy proposes several changes in Commandant policy on confined space entry. The most important of these changes involves accepting a "competent person" to conduct atmospheric testing prior to initial entry by Coast Guard personnel into specific types of confined spaces. This proposed policy is consistent with reference (b) that allows Eighth District Officers in Charge, Marine Inspection (OCMIs) to authorize competent persons to conduct atmospheric testing for initial entry into specific confined spaces where oxygen deficiency or combustibility are the **only** risks (i.e. no toxics or materials with permissible exposure limit (PEL) or threshold limit value (TLV) potential). In compliance with reference (b), some Eighth District OCMIs are currently accepting competent persons to perform atmospheric testing for initial entry of Coast Guard personnel into certain confined spaces where the only risk is oxygen deficiency or combustibility. The experiences and observations of these OCMIs will be particularly valuable in responding to reference (a). Accordingly, please indicate in your response whether your command has accepted competent persons to conduct atmospheric testing for initial entry into confined spaces and, if applicable, describe your experiences with this policy.
4. Recently, the issue of confined space entry on mobile offshore drilling units (MODUs) has been the subject of considerable discussion. Reference (b) requires a certified marine chemist to

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initiate entry into MODU spud cans, mat tanks, and other confined spaces that have a risk of exposure to toxics. Reference (b) also identifies an individual referred to as an "offshore competent person" (OCP) who may be permitted by an OCMI to conduct atmospheric testing to certify initial entry of Coast Guard personnel into certain confined spaces on MODUs in situations not involving the risk of exposure to toxics. The expected training and qualifications of an OCP are outlined in broad terms in reference (b). Numerous inquiries requesting detailed training requirements have been received and, to date, we have been unable to provide specifics. Although Commandant is working on this issue, we believe we can promote consistency and provide additional guidance to industry by adopting the definition of "competent person" described on pages 3 and 4 of the enclosure to reference (a) in place of the current OCP training and qualifications listed in reference (b). I believe it is important to provide consistency in the definition of "competent person" regardless of the individual's location in a shipyard or on the Outer Continental Shelf. I am interested in your comments relative to this proposed change.

5. During a recent meeting with representatives of the offshore industry, we were informed that the implied prohibition contained in reference (b) against using an individual assigned to a MODU as an OCP was eliminating a number of well qualified candidates for this duty. After some consideration, I have decided to eliminate this provision in the next change to reference (b). Effective immediately, OCMI's are authorized to accept individuals with the required training and experience as OCP's regardless of their normal work location.

6. Protection of Coast Guard personnel remains the highest priority for Coast Guard leaders and managers. Effective training, use of personal protective equipment and personal oxygen and/or hydrogen sulfide alarms, and compliance with confined space entry policy are our best tools for ensuring the safety of our people. As discussed in references (a) and (b), the Commanding Officer always retains the option of requiring a marine chemist to certify a space "Safe for Workers" prior to entry by Coast Guard personnel.

7. Should you have any questions, please contact Lieutenant Commander Bill Daughdrill of my staff at (504) 589-6271.



GUY A. TETREAU
By direction

Distribution: All Eighth District MSOs, MSU and MSDs.

Copy: Commandant (G-MSO)