

DEPARTMENT OF TRANSPORTATION

U. S. COAST GUARD

STATEMENT OF

CAPTAIN WILLIAM J. ECKER

DEPUTY CHIEF, OFFICE OF MERCHANT MARINE SAFETY

BEFORE THE HOUSE MERCHANT MARINE AND FISHERIES COMMITTEE
SUBCOMMITTEE ON THE PANAMA CANAL AND THE OUTER CONTINENTAL SHELF

AT WASHINGTON, D. C.

ON NOVEMBER, 12, 1985

GOOD MORNING, MR. CHAIRMAN AND MEMBERS OF THE SUBCOMMITTEE. I AM CAPTAIN WILLIAM J. ECKER, DEPUTY CHIEF OF THE OFFICE OF MERCHANT MARINE SAFETY OF THE U.S. COAST GUARD. ACCOMPANYING ME IS MR. JOSEPH ANGELO, ASSISTANT CHIEF OF THE MERCHANT VESSEL INSPECTION DIVISION. I AM PLEASED TO HAVE THIS OPPORTUNITY TO TESTIFY BEFORE THIS SUBCOMMITTEE CONCERNING THE PROPOSED H.R. 1748, THE OFFSHORE INSTALLATION EMERGENCY EVACUATION BILL.

H.R. 1748, AS DRAFTED, WOULD REQUIRE THE COAST GUARD TO PROMULGATE REGULATIONS REQUIRING EACH MANNED INSTALLATION ON THE OCS -- THE OUTER CONTINENTAL SHELF -- TO BE PROVIDED WITH A STANDBY VESSEL IN ITS IMMEDIATE VICINITY. IT WOULD ALSO REQUIRE THE COAST GUARD TO PROMULGATE REGULATIONS REQUIRING EACH MANNED INSTALLATION TO BE PROVIDED WITH THE SAFEST POSSIBLE EVACUATION EQUIPMENT TO SUPPLEMENT THE STANDBY VESSEL.

THE COAST GUARD FEELS THAT PROPERLY DESIGNED AND EQUIPPED STANDBY VESSELS IN THE IMMEDIATE VICINITY OF MANNED OCS FACILITIES MAY, IN SOME CASES, IMPROVE SAFETY ON THE OUTER CONTINENTAL SHELF. IN THE EVENT OF A MAJOR CASUALTY TO AN OFFSHORE INSTALLATION, THE IMMEDIATE PRESENCE OF A PROPERLY DESIGNED AND EQUIPPED STANDBY VESSEL, MANNED BY A SPECIALLY TRAINED CREW, MIGHT IN SOME CASES INCREASE THE CHANCES OF SURVIVAL OF THE INSTALLATION'S CREW MEMBERS. WE MUST NOT, HOWEVER, LOSE SIGHT OF THE FACT THAT A MAJOR CAUSE OF RIG AND PLATFORM ABANDONMENT HAS HISTORICALLY BEEN SEVERE WEATHER. UNLESS

STANDBY VESSELS ARE DESIGNED TO WITHSTAND THOSE SEVERE CONDITIONS, REQUIRING THEM TO REMAIN ON SCENE COULD PLACE THE VESSELS AND THEIR CREWS IN JEOPARDY. FURTHER, THE RISKS INHERENT IN BOARDING A STANDBY VESSEL IN SEVERE WEATHER CONDITIONS MUST BE COMPARED TO AND ANALYZED AGAINST THE ADVANTAGES OF USING THE INSTALLATION'S PRIMARY LIFESAVING EQUIPMENT.

A REVIEW OF STANDBY VESSEL REGULATIONS PROMULGATED BY THE NORWEGIAN, CANADIAN, AND BRITISH GOVERNMENTS REVEALS VERY SPECIFIC CRITERIA REGARDING DESIGN, EQUIPMENT, OPERATIONS AND CREW TRAINING FOR VESSELS DESIGNATED AS STANDBY VESSELS. I HAVE ATTACHED EXTRACTS OF THE STANDBY VESSEL RULES PROMULGATED BY THESE GOVERNMENTS. THE COAST GUARD FEELS STRONGLY THAT STANDBY VESSELS, WHETHER MANDATORY OR REQUIRED AS PART OF AN OVERALL EVACUATION PLAN, SHOULD BE DESIGNED AND EQUIPPED SPECIFICALLY FOR THIS TASK AND MANNED WITH PERSONNEL PROPERLY TRAINED IN MARINE RESCUE.

THIS NOTWITHSTANDING, THE COAST GUARD BELIEVES THAT REASONABLE, AND PERHAPS SAFER, ALTERNATIVES TO STANDBY VESSELS MAY EXIST. THE WELL-BEING OF THE OFFSHORE WORKER IS THE DRIVING FORCE BEHIND THE PROPOSED OFFSHORE INSTALLATION EMERGENCY EVACUATION ACT. FOR THIS REASON, THE COAST GUARD BELIEVES THAT SUFFICIENT FLEXIBILITY MUST BE PROVIDED TO EXPLORE AND, WHERE POSSIBLE, INTEGRATE THE BEST AND SAFEST TECHNOLOGY AVAILABLE TO ENSURE THE SAFETY OF THESE WORKERS.

SINCE WE LAST TESTIFIED ON THIS ISSUE IN OCTOBER 1984, THE COAST GUARD PUBLISHED, IN THE MARCH 7, 1985, FEDERAL REGISTER, AN ADVANCED NOTICE OF PROPOSED RULEMAKING ENTITLED "REVISION OF THE REGULATIONS ON OUTER CONTINENTAL SHELF ACTIVITIES." INCLUDED IN THIS NOTICE OF PROPOSED RULEMAKING WAS A REQUEST FOR COMMENTS REGARDING THE USE OF STANDBY VESSELS IN AN OVERALL EVACUATION PLAN FOR BOTH MOBILE OFFSHORE DRILLING UNITS AND FIXED PLATFORMS. ADDITIONALLY, THIS ADVANCE NOTICE OF PROPOSED RULEMAKING ALSO ADDRESSED THE COAST GUARD'S INTENTION TO UPGRADE EXISTING REQUIREMENTS FOR PRIMARY LIFESAVING APPLIANCES FOR FIXED OCS FACILITIES. I HAVE ATTACHED A COPY OF THAT ADVANCE NOTICE OF PROPOSED RULEMAKING. THE COAST GUARD BELIEVES THAT A MOBILE OFFSHORE DRILLING UNIT OR PLATFORM SHOULD, TO THE MAXIMUM EXTENT POSSIBLE, BE SELF-SUSTAINING AND CAPABLE OF PROVIDING ITS OWN MEANS OF ABANDONMENT IN THE EVENT OF AN EMERGENCY. IN THIS REGARD, THE COAST GUARD IS CONTINUALLY STRIVING TO IMPROVE AND INCORPORATE THE LATEST DEVELOPMENTS IN THE DESIGN AND LAUNCHING ARRANGEMENT OF PRIMARY LIFESAVING APPLIANCES.

IN RESPONSE TO THIS ADVANCE NOTICE OF PROPOSED RULEMAKING, THE COAST GUARD RECEIVED A TOTAL OF 697 COMMENTS. THE COMMENT PERIOD FOR THIS ADVANCE NOTICE OF PROPOSED RULEMAKING ENDED IN JUNE, BUT AT THE REQUEST OF INDUSTRY, THE COMMENT PERIOD WAS EXTENDED UNTIL SEPTEMBER 1985. A SUMMARY OF THOSE COMMENTS SPECIFICALLY ADDRESSING THE ISSUE OF STANDBY VESSELS AND EMERGENCY EVACUATION INCLUDE:

593 FORM LETTERS FROM RESIDENTS OF SOUTH LOUISIANA, PRIMARILY FROM LAFOURCHE AND TERREBONE PARISHES, WHO ARE IN SUPPORT OF MANDATORY STANDBY VESSELS,
57 COMMENTS FROM BOAT OWNERS IN SUPPORT OF MANDATORY STANDBY VESSELS,
4 RESPONSES FROM BOAT OWNERS OPPOSED TO MANDATORY STANDBY VESSELS,
13 RESPONSES FROM PRODUCING COMPANIES WHO ARE OPPOSED TO MANDATORY STANDBY VESSELS,
6 RESPONSES FROM INDUSTRY ORGANIZATIONS OPPOSED TO STANDBY VESSELS,
AND 25 RESPONSES FROM PRODUCING COMPANIES, INDUSTRY ORGANIZATIONS AND FEDERAL GOVERNMENT AGENCIES WHO ARE SUPPORTIVE OF A FLEXIBLE EVACUATION PLAN THAT ALLOWS THE USE OF STANDBY VESSELS WHERE APPROPRIATE.

WE ARE NOW IN THE PROCESS OF EVALUATING THESE COMMENTS AND DEVELOPING A NOTICE OF PROPOSED RULEMAKING WHICH WILL SPECIFICALLY INCORPORATE THE COMMENTS AS APPROPRIATE.

BASED ON THE INFORMATION GATHERED THUS FAR, IT IS ENVISIONED THAT THE COAST GUARD PROPOSED RULES WOULD ESTABLISH AN EVACUATION PERFORMANCE STANDARD AND REQUIRE A SITE-SPECIFIC EMERGENCY EVACUATION CONTINGENCY PLAN, MEETING THAT STANDARD, AND THEREBY PROVIDE GREATER FLEXIBILITY IN ADDRESSING SPECIFIC EVACUATION NEEDS OF EACH INSTALLATION. SUCH A PLAN WOULD ADDRESS THE GEOGRAPHICAL, ENVIRONMENTAL, AND UNIQUE DESIGN AND OPERATING CHARACTERISTICS OF EACH INSTALLATION. THIS WOULD

ENCOURAGE THE BEST AVAILABLE AND SAFEST TECHNOLOGY CONCEPT ADDRESSED BY THE OUTER CONTINENTAL SHELF LANDS ACT, AS AMENDED. SUCH AN APPROACH WOULD ALLOW STANDBY VESSELS, WHERE APPROPRIATE, TO BECOME AN INTEGRAL PART OF AN OVERALL EMERGENCY EVACUATION PLAN THAT WOULD BE TAILORED TO THE SPECIFIC NEEDS OF EACH INSTALLATION, THEREBY PROVIDING THE MOST FEASIBLE EMERGENCY EVACUATION OF EACH MANNED INSTALLATION ON THE OCS.

CONSIDERING THE DIVERSITY OF THE ENVIRONMENTAL CONDITIONS THAT EXIST WITHIN THE OUTER CONTINENTAL SHELF OF THE UNITED STATES, FROM THE GULF OF MEXICO TO THE ARCTIC FRONTIER, NEW DEVELOPMENTS IN PRIMARY LIFESAVING EQUIPMENT, AND THE VARYING OPERATIONAL CHARACTERISTICS OF OFFSHORE INSTALLATIONS, THE COAST GUARD BELIEVES THAT THE EXISTING RULEMAKING PROJECT TO REVISE THE OCS ACTIVITIES REGULATIONS, COAST GUARD DOCKET NUMBER CGD 84-098, PROVIDES THE MOST APPROPRIATE FORUM FROM WHICH TO ADDRESS THIS ISSUE AND THAT LEGISLATION IS NOT NECESSARY. THEREFORE, WE OPPOSE ENACTMENT.

MISTER CHAIRMAN, THIS CONCLUDES MY STATEMENT. I WILL BE GLAD TO ANSWER ANY QUESTIONS THAT YOU OR MEMBERS OF THE SUBCOMMITTEE MAY HAVE.