



# INTERNATIONAL ASSOCIATION OF DRILLING CONTRACTORS

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25 May 2010

[Docket Number USCG-2006-24797]

Docket Management Facility (M-30)  
U.S. Department of Transportation  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue SE.  
Washington, DC 20590-0001

Re: Carbon Dioxide Fire Suppression Systems on Commercial Vessels  
[RIN 1625-AB44]

To whom it may concern:

The International Association of Drilling Contractors is a trade association representing the interests of drilling contractors, onshore and offshore, operating worldwide. Our membership includes all drilling contractors currently operating mobile offshore drilling units (MODUs) in the areas subject to the jurisdiction of the United States, as well as all MODUs registered in the United States.

The purpose of this letter is to respond to the United States Coast Guard's 24 February 2010 Notice of Proposed Rulemaking (75 FR 8432), which proposes to amend the current regulations for fire suppression systems on several classes of commercial vessels. In particular, the amendments would clarify approved alternatives to using carbon dioxide systems, as well as requiring lockout valves and olfactory additives when new or existing carbon dioxide (CO<sub>2</sub>) systems are used in spaces that can be accessed by persons onboard.

IADC supports the Coast Guard's efforts to promote maritime safety by providing alternative arrangements and installing additional measures of safety with regards to CO<sub>2</sub> fixed firefighting systems. We offer the following comments and recommendations regarding this proposed rulemaking for your consideration:

## ***Implementation***

We fully concur that CO<sub>2</sub> systems installed on new vessels would be able to meet these new requirements during initial construction. However, the proposed rulemaking also requires existing vessels to make the proposed modifications to their CO<sub>2</sub> systems within five years of publication of the final rule.

IADC recommends that existing vessels should be allowed up to the end of their full system maintenance cycle of twelve (12) years to meet the requirements of this rulemaking. Our recommendation is based on the stated maintenance requirements in NFPA 12, 2008 Edition (Section 4.6.5.2.1) and Title 46 (46 CFR 147.65) regarding high pressure CO2 cylinders, which is the predominant installation-type utilized on MODUs. Both references indicate that CO2 cylinders continuously in service without discharging shall be permitted to be retained in service for a maximum of 12 years from the date of the last hydrostatic test. Notwithstanding our recommendation, IADC is not adverse to encouraging voluntary compliance with the new requirements by vessels at their earliest opportunity.

### ***Applicability***

To IADC it is unclear if this rulemaking will apply to foreign flag MODUs operating on the U.S. Outer Continental Shelf under a U.S. Certificate of Compliance. As stated in 33 CFR 143.207, some foreign flagged MODUs may be required to meet the design and equipment standards of 46 CFR Part 108, which will be modified by the proposed rulemaking. Therefore, IADC requests clarification from the Coast Guard as to the applicability of this rulemaking to foreign flagged MODUs engaged in OCS activities. If the Coast Guard decides that it is applicable, IADC believes that U.S. type approval of a non-U.S. manufactured CO2 system would be problematic.

### ***Use of the term “Master”***

Not every vessel requires a “Master” and even for those where a master is required, the master may only be required if the vessel is underway. Therefore, it is inappropriate to designate the master to ensure that the lockout valve is locked in the open position when maintenance is complete and the system is returned to an operable condition. IADC recommends substitution of the phrase “master or person-in-charge” for the term “master” throughout the rulemaking.

As an alternative to assigning the responsibility to the master (or person-in-charge), and presuming that the Coast Guard’s main intent is to ensure that the system is returned to an operable condition, IADC suggests the use of a lock-out/tag-out system, which is a more generally accepted method to ensure that each valve (e.g., lockout valve) is correctly positioned after maintenance.

IADC appreciates the opportunity to comment on the proposed rulemaking and requests that our comments be given due consideration. If you have any questions about these comments or recommendations, please contact me by phone at (713) 292-1945, ext. 203.

Sincerely,



John Pertgen  
Assistant Director,  
Offshore Technical and Regulatory Affairs

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