

RULES PROCESSING TEAM

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Department of the Interior
Attention: Rules Processing Team (RPT)
Minerals Management Service; MS 4024
381 Elden Street
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Re: Incorporation by Reference of American Petroleum Institute's Specification 2C for Offshore Cranes

Here are my comments in response to the questions in your notice in the Federal Register:

(a) Will the addition of API Spec 2C to MMS's documents incorporated by reference increase safety and safe operations on the OCS?

No. There is too much flexibility in interpretation of Spec 2C for it to have any effect on safety of OCS operations. Only if some of the flexibility is removed will there be an increase in safety. I address the shortcomings of Spec. 2C below.

(b) Are there other standards for offshore cranes that may be appropriate for MMS to incorporate as part of MMS's regulations?

Yes, MMS should also accept cranes certified to the American Bureau of Shipping's "Certification of Cranes (1991)"

(c) When should MMS require all cranes on OCS fixed platforms to be fully compliant with API Spec 2C?

This question seems to presume that: (1) despite the question posed immediately before, there are no other standards appropriate to offshore cranes; and (2) API Spec 2C is appropriately applied to "all cranes on OCS fixed platforms." Why did MMS pose the previous question if it has already made up its mind? A reading of Spec 2C would reveal that it is only applicable to pedestal cranes. MMS should use this rulemaking to prohibit the use of mobile cranes on OCS fixed platforms.

(d) Is a 1-year transition period enough time for industry to comply with the change proposed in §250.108(c)?

Again, this question implies that MMS isn't going to consider any alternatives to the changes it proposed. This said, one year should offer enough time if MMS is willing to accept as "existing" any crane that has been ordered prior to the date of the final rule.

(e) Should MMS establish a requirement similar to the U.S. Coast Guard (USCG), which requires cranes to be installed according to an approved crane plan and inspected and load tested by an Agency-approved third party when the crane is installed?

Yes.