



Interviews with offshore authorities: A webinar series on U.S. offshore wind regulatory issues

First Topic Thursday, January 31, 2019

The U.S. Coast Guard's Oversight Roles During the Implementation Phase of Offshore Wind Projects

Save the Dates:

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Second Topic Thursday, February 14, 2019

Bureau of Safety and Environmental Enforcement's Safety Oversight of Offshore Wind Projects

Third Topic Thursday, March 14, 2019

Jones Act Compliance and U.S. Offshore Wind Projects

IPF Afternoon Pre-Conference Monday, April 8, 2019



THE IMPLEMENTATION PHASE OF OFFSHORE WIND PROJECTS





THE U.S. COAST GUARD'S ROLE





INTRODUCTIONS

- Moderator: Allen Black, Partner at Winston & Strawn LLP (Washington)
- Edward LeBlanc, Chief of Waterways Division, Coast Guard Sector Southeastern New England
- Carl Moberg, Asst Chief Inspection Division, Coast Guard Sector Southeastern New England





OVERVIEW

- Vessel Safety & Compliance
- Navigational Safety
- Vessel Operations
- Maritime Security
- Emergency Response
- Marine Casualty Investigations
- Compliance with U.S. Laws
- Coordination with other agencies



VESSEL SAFETY – FOREIGN FLAG VESSELS



- Port State Control Regime
- Confirm all required int'l certificates
 - SOLAS Safety Construction Certificate
 - SOLAS Safety Equipment Certificate
 - Safety Management Certificate
 - Load Line Certificate
 - IOPP Certificate, IAPP Certificate



VESSEL SAFETY – FOREIGN FLAG VESSELS



- Vessel holds all required U.S. Certificates
 - U.S. Vessel General Permit NOI
 - U.S. Certificate of Financial Responsibility
 - USCG Approved U.S. Non-Tank Vessel Response Plan



VESSEL SAFETY – FOREIGN FLAG VESSELS



- Vessel Examination
 - Compliance with certificates
 - Condition of vessel
 - Condition of vessel equipment
 - Crew competence
 - Compliance with US and international regs
 - Pollution Prevention
 - Safety



NTZ/ Foreign Vessel



NTZ/ Foreign Vessel



NTZ/ Foreign Vessel



VESSEL SAFETY – U.S. FLAG VESSELS



- Vessel Inspection (as applicable)
- “New to Zone” inspection
- Vessel certificates up to date
- Vessel condition up to standards
- Vessel equipment condition
- Crew competence
- Safety Management System implemented



Wind Farm Specific Vessel “SUB L/T WHY?”



SUB L/T



- OSV vs T
 - OSV “privileges”
 - Traditional crew boat & OSV ops
- Multi Cert vsl; Sub L (16 OSW) & sub T (48 pax)
- Gap analysis between T and L



Damage Stability



NAVIGATIONAL SAFETY



- Review Navigation Plan
 - Look at support base locations, proposed waterborne logistics operations
 - Waterways sufficient to support proposed operations?
 - Bridge & Channel clearances?
 - Impact & Interface with other marine activities?
- Ensure the safety of navigation for other vessels during construction



Fueling/Loading/Logistics





VESSEL OPERATIONS

- Vessels safe for operating environment?
- Safety of proposed vessel operations?
 - Operating Weather Parameters
 - Vessel Operations Plans
 - Tower Installation
 - Cable-laying
 - Worker transfers



VESSEL OPERATIONS



- Support and Safety Plan
 - Support Vessel Operations
 - Evacuation Plans
 - Crew Support Plans



MARITIME SECURITY



- The Coast Guard has jurisdiction to oversee and promote maritime security for facilities and vessels within U.S. waters
- Offshore Wind Farm is “not currently” considered to be a “facility”
- But, the CG will work with the offshore wind contractor to support the security of the project and supporting vessels





EMERGENCY RESPONSE

- Emergency Notification and Communications
- Rescue and Assistance Resource Coordination
- Emergency Planning
 - Personnel Retrieval
 - Salvage planning



ACCIDENT INVESTIGATIONS



- Responsibility to investigate marine casualties
- Coordination with other agencies, other flag states



COMPLIANCE WITH U.S. LAWS



- Enforce compliance with U.S. laws
 - Pollution, Criminal, Customs
- Shared responsibilities with regard to personnel safety
 - BSEE / BOEM
 - OSHA
 - Local U.S. State
 - Flag State



COORDINATION WITH OTHER AGENCIES

- BOEM
- BSEE
- CBP
- INS
- States
- OSHA
- NTSB



WORKING WITH THE COAST GUARD



- Recognize common goals
 - Safety
 - Facilitate operations
 - Respect all stakeholders
- Early introductions -- meetings
- Understanding of CG organization
- Open communications
- Respect the decision process



COAST GUARD ORGANIZATION



- Areas
- Districts
- Sectors
 - Sector Commander
 - Captain of the Port / OCM
 - Waterways
 - Prevention
 - Investigations
 - Response





COMMUNICATIONS

- Primary Point of Contact
- Keep persons in the loop
- Emails
- Phone calls
- Meetings
- Full disclosure
 - Misleading is a crime!
 - AND it's never helpful



DECISION PROCESS



- Follow the Chain of Command
- May be delegations of authority
- Must follow statutes, regulations unless authority for exemptions
- Must consider other offices, stakeholders
- Consultation and consideration takes time





KEY POINT

- Open Communication is the key.



QUESTIONS AND DISCUSSION

