

MMS questions	Comments received	MMS response
(g) Should a rental crane that is installed on OCS fixed platforms be considered a new crane and, therefore be required to be fully compliant with API Spec 2C?	<p>All that commented said that rental cranes should not be considered a new crane. Additional comments were:</p> <ul style="list-style-type: none"> • But rental cranes should meet API Spec 2C. • It is not practical to retroactively seek certification of existing rental cranes. • All new rental cranes should be compliant with API Spec 2C, but some existing rental cranes may not be able to be brought to the specification. <p>"Rental cranes" covers a large variety of lifting devices. A considerable number of rental cranes are misrepresented. All rental cranes that are designed to pick up over 10,000 pounds should be required to meet the requirements of API Spec 2C.</p>	<p>The term "rental crane" is not used in the final rule. The final rule clarifies which cranes must meet the requirements of API Spec 2C. The response to question (c) identifies the cranes that must meet the specification.</p> <p>Comments on rental cranes indicated that there are differing definitions of what constitutes a rental crane. The comments also raise the issue about the appropriate use of rental cranes. MMS will include these issues in the discussion with interested parties after the publication of the final rule.</p>
(h) Should MMS limit the type of anti-two block devices that are acceptable? What are the known failure rates of the different types?	<p>One commenter said that all hydraulic cranes should have a shut down system as the anti-two block device. Mechanical cranes could allow for audible alarms until the crane has a major overhaul. Another commenter states that MMS should limit the types of anti-two block safety devices to those capable of shutting down the crane.</p> <p>One comment was that MMS should not limit the types of anti-two block devices because API 2C adequately addresses the issue.</p> <p>One comment suggested that MMS examine the Society of Automotive Engineers (SAE) standards regarding problems that may be encountered with the different types of anti-two block safety devices.</p> <p>One commenter stated the repeated testing as required by API RP 2D leads to the failure of the device.</p>	<p>The final does not limit the type of anti-two block devices that must be installed on all cranes. The final rule provides lessees and operators the flexibility and opportunity to choose the anti-two block safety device that best suits the particular operation. Limiting lessees to a certain type of anti-two block device could create a financial hardship and may not increase safety. It is the lessee's responsibility to operate its cranes safely.</p> <p>The MMS' review of the SAE standard did not reveal any new information that could be used as part of this final rule.</p>
(i) Should MMS consider an additional cost factor for retrofitting existing cranes with the anti-two block safety device (e.g., an associated cost for the amount of time a crane is expected to be out-of-service while it is being retrofitted).	<p>One commenter said that MMS should consider all costs associated with the installation of anti-two blocks. Another said MMS should consider out-of-service time while another commenter said that the time to install the necessary equipment could be planned to minimize or eliminate any out-of-service time. MMS should also consider the cost of replacing a crane if it can't be retrofitted for an anti-two block device</p>	<p>With proper planning (e.g., parts and personnel are at the work location before the crane is taken out of service), lessees should be able to keep out-of-service time a minimum. The final rule now provides a 2-year instead of the 1-year transition period that was in the proposed rule. This revision ensures that lessees will have sufficient time to install an anti-two block device without disrupting crane activities. MMS has determined that any additional costs associated with retrofitting existing cranes should be minimized and were considered in this rulemaking.</p>

As noted in the responses to question (e), MMS believes that the installation of rental cranes and the relocation of cranes are issues that warrant additional attention. There have been numerous incidents and serious accidents involving the installation and use of rental cranes, including a fatal accident that occurred on May 5, 2002. However, any additional regulatory actions dealing with rental cranes are beyond the scope of this rulemaking. MMS will initiate discussions with operators, crane manufacturers, crane service companies, and other interested parties on the issues concerning rental cranes.

Finally, one commenter provided several relatively inexpensive suggestions and modifications for

making older cranes (pre-1983) safer. These suggestions and modifications are:

- Maintain and post "Actual Lift Capacity Charts" in the cab of crane.
- Install high angle safety systems for lattice boom cranes or cranes that use a boom hoist and wire rope to lift the boom.
- Upgrade wire rope to meet the latest API Spec 2C safety factors.
- Post caution signs on all pre-1983 cranes and all non-API cranes to warn the crane operators that these cranes may not have the same safety factors as cranes built after 1983.

MMS is passing these suggestions on to lessees, operators, and contractors in

the hope that they may be used to improve crane safety on the OCS.

Procedural Matters

The specifications in the API Spec 2C document we are incorporating by reference are currently widely accepted industry standards. The USCG has already incorporated API Spec 2C into its regulations. All cranes manufactured after 1983 came equipped with the anti-two block safety devices, and many earlier model cranes have been retrofitted with the anti-two block safety devices. The final rule will cause lessees to retrofit approximately 200 cranes that currently do not have anti-two block devices. MMS estimates that this will cost lessees approximately \$800,000.