



## Comment on BSEE-2014-0002-0001

This is a Comment on the **Bureau of Safety and Environmental Enforcement (BSEE) Proposed Rule: Oil and Gas and Sulphur Operations in the Outer Continental Shelf: Incorporated Cranes Standard**

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### Comment

As a Manufacturer we normally preform a gap analysis to identify any "Gaps" between the crane monogram and the required specification to develop a Load Rating Chart and list the upgrades for the refurbishment of equipment. To perform this review to the 7th edition could mean a complete design review of the crane which will extend the delivery process and increase the cost of refurbishment.

One of the greatest changes is the reevaluation of fatigue cycles/calculations (this is not noted in the BSEE Rule)

The Review of the duty cycle , as detailed in the 7th edition of API Specification 2 C, will be required in order to conform to the proposed Rule.

Temporary cranes which are used for specific or "Built for Purpose" and are used on mostly engineered lifts should not have to meet the latest API or BSEE requirements as long as the safety equipment or operations are present.

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