

MSC Guidelines for the Review of Procedures & Arrangements Manuals for U.S. Vessels that Trade Internationally

Procedure Number: C1-44

Revision Date: June 25, 2015

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Purpose

To establish the procedure for reviewing and approving Procedures & Arrangements (P&A) Manuals for the carriage of Noxious Liquid Substances (NLS) aboard U.S. vessels that are certificated for international trade.

References

- a. NVIC 03-06, Guidance on Implementation of Revisions to MARPOL Annex II and the IBC Code, dated November 28, 2006
 - b. Annex II of the International Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978 (MARPOL)
 - c. CG-ENG Policy Letter 03-12, "Policy on the Implementation of IMO resolution A.673(16), Guidelines for the Transport and Handling of Limited Amounts of Hazardous and Noxious Liquid Substances in Bulk on Offshore Support Vessels, for New and Existing U.S. Offshore Supply Vessels" dated May 15, 2012
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Contact Information

If you have any questions or comments concerning this document, please contact the Marine Safety Center (MSC) by email or phone. Please refer to the Procedure Number C1-44.

Email: MSC@uscg.mil

Phone: 703-872-6731

Website: <http://homeport.uscg.mil/msc>

Responsibilities

Using applicable portions of references (a) through (c), the submitter shall provide sufficient documentation and plans to indicate compliance with the applicable requirements. The submission shall be made

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electronically to the above email address or, if paper, in triplicate to the MSC's address found on the above website. To facilitate plan review and project management, all plans and information specified in these guidelines should be submitted as one complete package by a single point of contact for the project.

Background

P&A Manuals are vessel-specific and outline the procedures and arrangements for the discharge of NLS.

In 2004, the IMO adopted several revisions to MARPOL Annex II and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code). These updates entered into force on January 1, 2007, and significantly changed the carriage requirements for bulk NLSs. NVIC 03-06 (reference a) provides guidance on the implementation of these changes, including the allowance that existing U.S. vessels that carry bulk NLS must comply with the changes to Annex II and the IBC Code, or stop trading internationally.

U.S. vessels constructed after January 1, 2007, must comply fully with these changes. U.S. vessels constructed before January 1, 2007 that operate on domestic voyages only, should have the old format P&A Manual, which refers to category A, B, C, and D cargoes. Under the new MARPOL Annex II revisions, OSVs that carry cargo internationally are required to have an approved Annex II P&A Manual. Reference (c) provides guidance on the implementation of revisions to MARPOL Annex II and the IBC Code as it relates to new and existing U.S. flagged OSVs.

This plan review guide applies to P&A Manual reviews conducted for U.S. vessels that operate internationally.

A vessel's P&A Manual should be approved by the MSC before that vessel receives authority to carry cargo.

In the past, Annex II gave the Flag Administration authority to specify the format and content of the P&A Manual for vessels that carried only Category D NLS cargoes and could not discharge NLS to sea. Therefore, in lieu of carrying P&A Manuals, vessels that could not discharge to sea (namely barges) would have their COI endorsed to prohibit the discharge of NLS to sea. However, the revisions to Annex II have eliminated the ability of the Flag Administration to specify the format and content of P&A

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Manuals for vessels that could not discharge NLS to sea. Therefore, every ship certified to carry Category X, Y, or Z NLSs on an international voyage shall carry an approved P&A Manual.

General Guidance

- ❑ Every ship subject to reference (b) shall carry an approved P&A Manual. Reference (a) provides additional information on the applicability of reference (b).
- ❑ Ensure the content and format of the P&A Manual meets the requirements found in Appendix 4 of reference (b).
- ❑ For OSVs, refer to Section 4.1 of reference (c) for guidance on the format and content of the P&A Manual. OSVs are required to have an approved Annex II P&A Manual even though they do not have underwater discharge ports and are not permitted to discharge NLS to sea. Sections applying to tank washing, ventilation, and stripping, as well as underwater discharge ports, will not apply to most OSVs. The guidance recommends text for sections 2.6, 2.8, 2.9, 3.3, 4.4.2, 4.4.3, 4.4.6, 4.4.7, 4.4.8, 4.4.9, and 4.4.10 of the P&A Manual.
- ❑ Determine the NLS Category of cargo which the vessel is authorized to carry (Category X, Y, or Z)
 - The determining factor in authorizing a vessel to carry a particular category of NLS is dependent on the vessel's ability to meet applicable stripping and discharge requirements.
 - The minimum pumping and stripping requirements for the carriage of each category of NLS is listed in Regulation 12 of reference (b), and as displayed in Table 2.1 of reference (a), which is shown below:

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Table 2.1: Stripping Requirements (in liters)

	Category X	Category Y	Category Z
New ship: keel laid after January 1, 2007	75	75	75
IBC ships on/before January 1, 2007	100 + 50 tolerance	100 + 50 tolerance	100 + 50 tolerance
BCH ships	300 + 50 tolerance	300 + 50 tolerance	900 + 50 tolerance
Others ships: keel laid on/before January 1, 2007	N/A	N/A	Empty to the most possible extent

Note: There is a 50-liter tolerance (allowance) for vessels with keel laid date on/before January 1, 2007. For vessels with keel laid date after January 1, 2007, there is no tolerance.

- ❑ A submitter is not required to conduct a stripping test prior to submitting a P&A Manual to the MSC. In this case, the P&A Manual may be provisionally “Approved” subject to verification by the OCMI, or if the vessel is enrolled in Alternate Compliance Program, by the Authorized Classification Society. In this instance, the following comment will appear in the outgoing correspondence:

“A stripping test shall be performed in accordance with paragraph 4.b of NVIC 03-06 to ensure the subject vessel meets the minimum stripping requirements listed in the revised MARPOL Annex II. The P&A Manual shall be resubmitted if the stripping test yields residual volumes greater than as specified in the P&A Manual. The Categories of NLS cargoes that the subject vessel is authorized to carry depends upon the outcome of these stripping tests.”
- ❑ In those instances where a vessel owner conducts a stripping test prior to submitting the P&A Manual to the MSC, the Staff Engineer will ensure that the stripping test results are within the standards listed in Regulation 12 of reference (b), and that the test results are properly documented in the submitted P&A Manual. The NLS Categories the vessel is authorized to carry will be noted in the following standard comment in the outgoing correspondence:

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“This vessel is authorized to carry those NLS Category (X, Y, Z) cargoes listed in the vessel’s Cargo Authority Attachment (CAA).”

- Vessels that, due to construction and arrangement, cannot discharge NLS to sea (namely barges and OSVs), are exempt from the stripping and discharge requirements found in Regulation 12 of reference (b). Therefore, in accordance with Regulation 4.4 of reference (b), the vessel’s COI shall be endorsed to prohibit the discharge of Noxious Liquid Substances (NLS) to sea and the following standard comment and COI endorsement will be included in outgoing correspondence:

“In accordance with Regulation 4.4 of Annex II to MARPOL 73/78, the subject barge is prohibited from ballasting cargo tanks and shall not discharge residues of Noxious Liquid Substances (NLS) to sea; NLS residues must be discharged to a licensed facility. The subject vessel’s relevant international certificate and Certificate of Inspection (COI) must be endorsed by the Officer in Charge, Marine Inspection (OCMI). For the OCMI’s convenience, we have included the following recommended endorsement:

In accordance with Regulation 4.4 of Annex II to MARPOL 73/78, no cargo tank containing a NLS cargo or its residue may be washed or ballasted unless the wash or ballast water is discharged to a licensed facility.”

Disclaimer

This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is not intended to, nor does it impose, legally-binding requirements on any party. It represents the Coast Guard’s current thinking on this topic and may assist industry, mariners, the general public, and the Coast Guard, as well as other federal and state regulators, in applying statutory and regulatory requirements. You can use an alternative approach for complying with these requirements if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative, you may contact the MSC, the unit responsible for implementing this guidance.