

U.S. Department
of Transportation

United States
Coast Guard



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16711

August 19, 1999

Mr. Robert J. Alario
Offshore Marine Service Association
990 N. Corporate Drive, Suite 210
Harahan, LA 70123

Dear Mr. Alario:

I have reviewed your letter of July 23, 1999 requesting that OSVs be exempt from 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), and still receive a COI endorsement to carry NLS cargoes on international voyages. Commandant (G-MOC) recently determined that IMO Resolution A.673(16) is non-binding on the United States and the Coast Guard will not require that standard for OSVs carrying NLS cargoes on international voyages. The subject IMO resolution has not been incorporated into SOLAS or U.S. regulations at this time. Therefore, the U.S. Coast Guard will continue to issue COI endorsements for U.S. flag OSVs for carriage of NLS cargoes consistent with the provisions of 46CFR Subchapter I and L.

You should be aware that some foreign administrations may attempt to enforce the provisions of IMO Resolution A.673(16) during Port State Control boardings. For this reason, I would encourage your members to consider its provisions when designing the NLS handling and transfer systems on future OSVs. Upon request, the Marine Safety Center and the cognizant Officer in Charge Marine Inspections will review, inspect, and certify vessels using IMO Resolution A.673(16).

I appreciate your concern and wholeheartedly applaud your initiative in this matter. For further questions/concerns, please contact Lieutenant Commander Bill Daughdrill at (504) 589-6743.

Sincerely,

A handwritten signature in black ink, appearing to read "G. D. Marsh".

G. D. MARSH

Captain, U.S. Coast Guard
Deputy Chief, Marine Safety Division
By direction of the Commander
Eighth Coast Guard District

Copy: All Gulf Coast MSOs, MSU