



United States Coast Guard
U.S. Department of Homeland Security



CG-CVC
Office of Commercial Vessel Compliance

MI Notice 03-13
August 21, 2013

Marine Inspection Notice

Issuance of a Certificate of Compliance (COC) to a double bottom, single sided Chemical Tank Ship carrying OPA 90 oils in the center tanks only

This notice addresses questions regarding compliance with the double hull requirements on foreign tank vessels in 33 CFR § 157.10d, specifically; can a double bottomed, single side chemical tank vessel limit the carriage of oil to the center cargo tanks only and utilize its side tanks to fulfill the double hull requirements? Additionally, if this is permitted, how is compliance with OPA 90 verified by the Port State Control Officer (PSCO) for issuance of a Certificate of Compliance (COC)?

1. If one of the following criteria is met, double bottomed, single side chemical tank vessels operating as described above will be considered meeting the U.S. double hull standards of §157.10d and authorized to carry OPA-90 regulated cargos:
 - a. Documentation is onboard that the vessel's Flag Administration has certified that the vessel complies with the U.S. double hull standards per § 157.24(c), and, a PSCO verifies the vessel is in compliance with the conditions stipulated by the Flag Administration; or
 - b. The International Oil Pollution Prevention (IOPP) Certificate¹, Form B*, notes that the vessel meets double hull standards of MARPOL Annex I, Regulation 19.3 (paragraph 5.8.1.1 is marked with an "x"). Such an IOPP, is considered acceptable documentation that the tank vessel meets the U.S. double hull standards of § 157.10d [*see* NVIC 10-94 CH. 2, enclosure 1, Part III], if the PSCO verifies the vessel is in compliance with the conditions stipulated²; or

*Note: During all COC exams onboard a Chemical Tank Ship which is also receiving an endorsement for the carriage of oil, regardless of the cargo onboard at the time of the exam; the PSCO shall verify the vessel has a valid IOPP Certificate with a Supplemental Forms B (Oil Tankers) issued/onboard. Vessels which are not able to produce a valid IOPP Certificate w/Supplemental Form B shall not have the COC endorsed (box checked) authorizing the carriage of crude oil or other petroleum products.

¹ Flag Administrations issuing multiple IOPP Certificates/Supplemental Forms to a tank vessel should provide guidance to the operator regarding when each document is to be implemented dependant on the carriage of cargo to comply with MARPOL, and the appropriate control actions for the document which is not being used. This guidance may be incorporated into the vessel's Safety Management System (SMS) or addressed in a separate correspondence.

² Given the vast number of flag Administrations; stipulated conditions may be in the form of notes, remarks or equivalents identified on the IOPP Certificate or the Supplemental Form B, to include referral to separate correspondence.

- c. Documentation as specified in § 157.24 is submitted to the United States Coast Guard Marine Safety Center (MSC) before that vessel enters the navigable waters of the United States or the U.S. Exclusive Economic Zone (EEZ). The MSC must acknowledge that the vessel is considered a fully compliant double hull tanker for the carriage of OPA 90 “oils”. Additionally, a PSCO must verify that the vessel is in compliance with any conditions stipulated by the MSC.
2. For vessels which have completed a satisfactory COC exam and a PSCO has determined the vessel is in compliance with paragraph (1) above, a PSCO may issue a COC as follows:
 - a. The PSCO shall check the appropriate box on the COC form indicating the vessel meets the U.S. double hull design standards of 33 CFR 157.10d.
 - b. The PSCO shall include the following entry in the remarks section of the COC:
“Issuance of the COC for the carriage of chemicals is based on review of the certificate of fitness issued (mm/dd/yy) expires on (mm/dd/yy). Authorization for the carriage of OPA-90 regulated oil is based on review of [the certification from the flag Administration]; OR [MSC letter dated (mm/dd/yy)]; OR [the IOPP Certificate # XXXX with Supplement Form B attached, issued by (flag/RO name) on (mm/dd/yy)] documenting the vessel meets the U.S. double hull standards authorizing the carriage of OPA 90 regulated cargos in [list tank(s)/location as documented] only.”

For questions or concerns regarding this matter, contact LCDR Charles Fluke at Charles.k.fluke@uscg.mil.