



CHIEF, OFFICE OF MARINE SAFETY, SECURITY  
AND ENVIRONMENTAL PROTECTION  
UNITED STATES COAST GUARD  
WASHINGTON, D.C. 20593-0001

February 24, 1995

Dear Marine Transportation Industry,

Since passage of the Oil Pollution Act of 1990 (OPA 90), there has been considerable discussion regarding what products are "oil", as defined in the Federal Water Pollution Control Act (FWPCA). I recognize and accept that the broad definition of "oil" in the statute has caused some confusion.

To assist the marine transportation community in determining the applicability of various regulations to their operations, the Coast Guard has developed the enclosed list of products that are "oils" for the purposes of the FWPCA. Development of this list was based on a broad definition of oil, in keeping with the statutory intent of the FWPCA as amended by OPA 90.

While the enclosed list is extensive, and contains a large number of products, it does not contain all products that may be considered oil. This list is intended to serve as general guidance to the marine transportation community. We have presented the list first in alphabetical order and then as a petroleum or non-petroleum oil in alphabetical order. Also included is a list of all the products not considered oil as defined by the FWPCA.

I hope that these lists provide assistance in complying with the provisions of OPA 90. We are currently working with the other regulatory agencies to develop a more comprehensive list of products which may be considered an oil under the FWPCA and OPA 90. We expect the results of that effort will be published as a notice in the Federal Register.

Sincerely,

A handwritten signature in black ink, appearing to read "J. C. Card".

J. C. CARD  
Rear Admiral, U.S. Coast Guard

3 Enclosures

**LIST OF PETROLEUM AND NON-PETROLEUM OILS  
FOR THE PURPOSES OF THE FWPCA**

ALK	Alkanes (C6-C9)
AKI	iso- & cyclo-Alkanes (C10-C11)
AKP	Alkaryl polyether (C9-C20)
AKM	Alkenyl (C11+) amide
AAA	Alkyl(C8+)amine, alkenyl (C12+) acid ester mixture
AKB	Alkylbenzenes (C9+)
AIH	Alkylbenzene, Alkylindane, Alkylindene mixture (each C12-C17)
ADT	Alkyl dithiothiadiazole (C6-C24)
AES	Alkyl ester copolymer (C6-C18)
AKS	Alkyl phenol sulfide (C8-C40)
AFA	Animal and fish acids oils and distillates, n.o.s.
AFN	Animal and Fish oils, n.o.s.
AHO	Anthracene oil (Coal tar fraction)
AYF	Aryl polyolefin (C11-C50)
ASP	Asphalt
ARF	Asphalt blending stocks: Roofers flux
ASR	Asphalt blending stocks: Straight run residue
ACU	Asphalt: cutback Asphalt: emulsion
AVA	Aviation alkylates
BCA	Barium long chain alkaryl sulfonate (C11-C50)
BCH	Barium long chain alkyl (C8-C14) phenate sulfide
CPX	Calcium alkyl (C9) phenol sulfide, polyolefin phosphorosulfide mixture
CAY	Calcium long chain alkaryl sulfonate (C11-C50)
CAN	Calcium long chain alkyl phenate (C8-C40)
CPI	Calcium long chain alkyl phenate sulfide (C8-C40)
CAK	Calcium long chain alkyl salicylate (C13+) Calcium long chain phenolic amine (C8-C40)
CPO	Camphor oil Carbon black base
OCN	Cashew nut shell oil (untreated)
COR	Coal tar
CTP	Coal tar pitch (molten)
CCT	Creosote (Coal tar)
CWD	Creosote (Wood)
CNS	Cobalt naphthenate in Solvent naphtha
CMP	p-Cymene
DAB	Dialkyl(C10-C14) benzenes
DII	Diisopropyl naphthalene
DFE	Distillates: Flashed feed stocks
DSR	Distillates: Straight run
ECY	Ethyl cyclohexane
FAD	Fatty acid (saturated, C13+) Fatty acid amides
GOC	Gas oil: Cracked
GAK	Gasoline blending stocks: Alkylates
GRF	Gasoline blending stocks: Reformates
GAT	Gasoline: Automotive (not over 4.23g Pb/gal)

Enclosure (1)

GAV	Gasoline: Aviation (not over 4.86g Pb/gal)
GCS	Gasoline: Casinghead (natural)
GPL	Gasoline: Polymer
GSR	Gasoline: Straight run
-HMX	Heptane (all isomers)
HPX	Heptene (all isomers)
HXS	Hexane (all isomers)
HEX	Hexene (all isomers)
JAO	Jet fuel: Jet A-1
JPA	Jet fuel: Jet A
JPB	Jet fuel: Jet B
JPF	Jet fuel: JP-4
JPV	Jet fuel: JP-5 (Kerosene, heavy)
JPE	Jet fuel: JP-8
KRS	Kerosene
LCP	Long chain alkaryl polyether (C11-C20)
LCS	Long chain alkaryl sulfonic acid (C16-C60)
	Long chain alkylphenate/Phenol sulfide
MAS	Magnesium long chain alkaryl sulfonate (C11-C50)
MPS	Magnesium long chain alkylphenate sulfide (C8-C20)
MLS	Magnesium long chain alkyl salicylate (C11+)
MCY	Methylcyclohexane
MNS	Mineral spirits
NCT	Naphtha: Coal tar solvent
	Naphtha: Heavy
	Naphtha: Paraffinic
PTN	Naphtha: Petroleum
NSV	Naphtha: Solvent
NSS	Naphtha: Stoddard solvent
NVM	Naphtha: VM & P (75% Naphtha)
NAX	Nonane (all isomers)
OAX	Octane (all isomers)
OBN	Oil, edible: Beechnut
OCA	Oil, edible: Castor
OCB	Oil, edible: Cocoa butter
OCC	Oil, edible: Coconut
OCL	Oil, edible: Cod liver
OCO	Oil, edible: Corn (maize)
OCS	Oil, edible: Cottonseed
OFS	Oil, edible: Fish
OGN	Oil, edible: Groundnut
OHN	Oil, edible: Hazelnut
OLD	Oil, edible: Lard
ONB	Oil, edible: Nutmeg butter
OOL	Oil, edible: Olive
OPM	Oil, edible: Palm
OPO	Oil, edible: Palm kernel
OPN	Oil, edible: Peanut
	Oil, edible: Peel
OPY	Oil, edible: Poppy
	Oil, edible: Poppy seed
ORA	Oil, edible: Raisin seed
ORP	Oil, edible: Rapeseed
ORB	Oil, edible: Rice bran

Enclosure (1)

OSF	Oil, edible: Safflower
OSL	Oil, edible: Salad
OSS	Oil, edible: Sesame
OSB	Oil, edible: Soya bean
OSN	Oil, edible: Sunflower seed
OTC	Oil, edible: Tucum
OVG	Oil, edible: Vegetable
OWN	Oil, edible: Walnut
OON	Oil, fuel: No. 1
OOD	Oil, fuel: No. 1-D
OTW	Oil, fuel: No. 2
OTD	Oil, fuel: No. 2-D
OFR	Oil, fuel: No. 4
OFV	Oil, fuel: No. 5
OSX	Oil, fuel: No. 6
	Oil, misc: Aliphatic
OMA	Oil, misc: Animal
	Oil, misc: Aromatic
OCF	Oil, misc: Clarified
	Oil, misc: Coal
OCM	Oil, misc: Coconut, fatty acid methyl ester
CFA	Oil, misc: Coconut oil, fatty acid
CFY	Oil, misc: Cottonseed oil, fatty acid
OCR	Oil, misc: Croton
OIL	Oil, misc: Crude
ODS	Oil, misc: Diesel
	Oil, misc: Gas, low pour
	Oil, misc: Gas, low sulfur
	Oil, misc: Heartcut distillate
OLL	Oil, misc: Lanolin
OLS	Oil, misc: Linseed
OLB	Oil, misc: Lubricating
OMN	Oil, misc: Mineral
OMS	Oil, misc: Mineral seal
OMT	Oil, misc: Motor
ONF	Oil, misc: Neatsfoot
OOI	Oil, misc: Oiticica
OPE	Oil, misc: Palm oil, fatty acid methyl ester
OPT	Oil, misc: Penetrating
OPR	Oil, misc: Perilla
OPL	Oil, misc: Pilchard
OPI	Oil, misc: Pine
	Oil, misc: Residual
ORD	Oil, misc: Road
ORN	Oil, misc: Rosin
	Oil, misc: Seal
	Oil, misc: Soapstock
	Oil, misc: Soybean (epoxidized)
OSP	Oil, misc: Sperm
OSD	Oil, misc: Spindle
OTL	Oil, misc: Tall
TOF	Oil, misc: Tall, fatty acid
TLO	Oil, misc: Tallow
OTF	Oil, misc: Transformer

Enclosure (1)

OTG	Oil, misc: Tung
OTB	Oil, misc: Turbine
OWH	Oil, misc: Whale
OCF	Olefin/Alkyl ester copolymer(mole wt. 2000+)
	Olefin mixtures (C5-C7)
OAM	alpha-Olefins (C6-C18) mixtures
	Olefins(C13+)
PNO	Palm kernel acid oil
PNF	Palm kernel acid oil, methyl ester
PFN	n-Paraffins (C10-C20)(also-n-alkanes(C10+))
PTX	Pentene (all isomers)
	Pentene, misc. hydrocarbon mixtures
PXE	1-Phenyl-1-xylyl ethane
PYR	Polyether (molecular weight 2000+)
	Polyolefin (molecular weight 300+)
POD	Polyolefin amide alkeneamine (C28+)
PAB	Polyolefin amide alkeneamine borate (C28-C250)
	Polyolefin amide alkeneamine molybdenum oxysulfide
PAP	Polyolefin amide alkeneamine polyol
POF	Polyolefin amine in alkyl (C2-C4) benzenes
POS	Polyolefin ester (C28-C250)
PPH	Polyolefin phenolic amine (C28-C250)
PPS	Polyolefin phosphorosulfide - Barium derivative
IPX	iso-Propylcyclohexane
SLS	Sodium long chain alkyl salicylate
SFO	Sulfohydrocarbon (C3-C88)
SFX	Sulfohydrocarbon, long chain (C18+) alkylamine mixture
TOB	Tall oil fatty acid, barium salt
TFD	Tallow fatty acid
	Tallow nitrile
THN	Tetrahydronaphthalene
TPT	Turpentine
VAO	Vegetable acid oils and distillates, n.o.s.
VEO	Vegetable oils, n.o.s.
WSL	White spirit (low (15-20%) aromatic)
ZAD	Zinc alkaryl dithiophosphate (C7-C16)
ZAP	Zinc alkyl dithiophosphate (C3-C14)

Enclosure (1)

**LIST OF PETROLEUM AND NON-PETROLEUM OILS  
FOR THE PURPOSES OF THE FWPCA**

**Petroleum Oils**

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AIH	Alkylbenzene, Alkylindane, Alkylindene mixture (each C12-C17)
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GPL	Gasoline: Polymer
GSR	Gasoline: Straight run
HMX	Heptane (all isomers)
HPX	Heptene (all isomers)
HXS	Hexane (all isomers)
HEX	Hexene (all isomers)
JAO	Jet fuel: Jet A-1
JPA	Jet fuel: Jet A

Enclosure (2)

JPB	Jet fuel: Jet B
JPF	Jet fuel: JP-4
JPV	Jet fuel: JP-5 (Kerosene, heavy)
JPE	Jet fuel: JP-8
KRS	Kerosene
LCP	Long chain alkaryl polyether (C11-C20)
LCS	Long chain alkaryl sulfonic acid (C16-C60)
	Long chain alkylphenate/Phenol sulfide
MAS	Magnesium long chain alkaryl sulfonate (C11-C50)
MPS	Magnesium long chain alkylphenate sulfide (C8-C20)
MLS	Magnesium long chain alkyl salicylate (C11+)
MCY	Methylcyclohexane
MNS	Mineral spirits
	Naphtha: Heavy
	Naphtha: Paraffinic
PTN	Naphtha: Petroleum
NSV	Naphtha: Solvent
NSS	Naphtha: Stoddard solvent
NVM	Naphtha: VM & P (75% Naphtha)
NAX	Nonane (all isomers)
OAX	Octane (all isomers)
OON	Oil, fuel: No. 1
OOD	Oil, fuel: No. 1-D
OTW	Oil, fuel: No. 2
OTD	Oil, fuel: No. 2-D
OFR	Oil, fuel: No. 4
OFV	Oil, fuel: No. 5
OSX	Oil, fuel: No. 6
	Oil, misc: Aliphatic
	Oil, misc: Aromatic
OCF	Oil, misc: Clarified
	Oil, misc: Coal
OIL	Oil, misc: Crude
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	Oil, misc: Gas, low sulfur
	Oil, misc: Heartcut distillate
OLB	Oil, misc: Lubricating
OMN	Oil, misc: Mineral
OMS	Oil, misc: Mineral seal
OMT	Oil, misc: Motor
OPT	Oil, misc: Penetrating
	Oil, misc: Residual
ORD	Oil, misc: Road
	Oil, misc: Seal
OSD	Oil, misc: Spindle
OTF	Oil, misc: Transformer
OTB	Oil, misc: Turbine
OCP	Olefin/Alkyl ester copolymer(mole wt. 2000+)
	Olefin mixtures (C5-C7)
OAM	alpha-Olefins (C6-C18) mixtures
	Olefins(C13+)
PFN	n-Paraffins (C10-C20)(also-n-alkanes(C10+)
PTX	Pentene (all isomers)

Enclosure (2)

	Pentene, misc. hydrocarbon mixtures
PXE	1-Phenyl-1-xylyl ethane
PYR	Polyether (molecular weight 2000+)
	Polyolefin (molecular weight 300+)
POD	Polyolefin amide alkeneamine (C28+)
PAB	Polyolefin amide alkeneamine borate (C28-C250)
	Polyolefin amide alkeneamine molybdenum oxysulfide
PAP	Polyolefin amide alkeneamine polyol
POF	Polyolefin amine in alkyl (C2-C4) benzenes
POS	Polyolefin ester (C28-C250)
PPH	Polyolefin phenolic amine (C28-C250)
PPS	Polyolefin phosphorosulfide - Barium derivative
IPX	iso-Propylcyclohexane
SLS	Sodium long chain alkyl salicylate
SFO	Sulfohydrocarbon (C3-C88)
SFX	Sulfohydrocarbon, long chain (C18+) alkylamine mixture
THN	Tetrahydronaphthalene
WSL	White spirit (low (15-20%) aromatic)
ZAD	Zinc alkaryl dithiophosphate (C7-C16)
ZAP	Zinc alkyl dithiophosphate (C3-C14)



## Non-Petroleum Oils

### Animal & Vegetable Non-Petroleum Oils

AFN	Animal and Fish oils, n.o.s.
AFA	Animal and fish acids oils and distillates, n.o.s.
FAD	Fatty acid (saturated, C13+)
	Fatty acid amides
OBN	Oil, edible: Beechnut
OCA	Oil, edible: Castor
OCB	Oil, edible: Cocoa butter
OCC	Oil, edible: Coconut
OCL	Oil, edible: Cod liver
OCO	Oil, edible: Corn (maize)
OCS	Oil, edible: Cottonseed
OFS	Oil, edible: Fish
OGN	Oil, edible: Groundnut
OHN	Oil, edible: Hazelnut
OLD	Oil, edible: Lard
ONB	Oil, edible: Nutmeg butter
OOL	Oil, edible: Olive
OPM	Oil, edible: Palm
OPO	Oil, edible: Palm kernel
OPN	Oil, edible: Peanut
	Oil, edible: Peel
OPY	Oil, edible: Poppy
	Oil, edible: Poppy seed
	Oil, edible: Raisin seed
ORA	Oil, edible: Rapeseed
ORP	Oil, edible: Rice bran
ORB	Oil, edible: Rice bran
OSF	Oil, edible: Safflower
OSL	Oil, edible: Salad
OSS	Oil, edible: Sesame
OSB	Oil, edible: Soya bean
OSN	Oil, edible: Sunflower seed
OTC	Oil, edible: Tucum
OVG	Oil, edible: Vegetable
OWN	Oil, edible: Walnut
OMA	Oil, misc: Animal
OCM	Oil, misc: Coconut, fatty acid methyl ester
CFA	Oil, misc: Coconut oil, fatty acid
CFY	Oil, misc: Cottonseed oil, fatty acid
OCR	Oil, misc: Croton
OLL	Oil, misc: Lanolin
OLS	Oil, misc: Linseed
ONF	Oil, misc: Neatsfoot
OOI	Oil, misc: Oiticica
OPE	Oil, misc: Palm oil, fatty acid methyl ester
OPR	Oil, misc: Perilla
OPL	Oil, misc: Pilchard
	Oil, misc: Soapstock
	Oil, misc: Soybean (epoxidized)
OSP	Oil, misc: Sperm
TLO	Oil, misc: Tallow

Enclosure (2)

OWH	Oil, misc: Whale
PNO	Palm kernel acid oil
PNF	Palm kernel acid oil, methyl ester
TFD	Tallow fatty acid
	Tallow nitrile
VAO	Vegetable acid oils and distillates, n.o.s.
VEO	Vegetable oils, n.o.s.

**Other Non-Petroleum Oils**

AHO	Anthracene oil (Coal tar fraction)
	Carbon black base
OCN	Cashew nut shell oil (untreated)
COR	Coal tar
CTP	Coal tar pitch (molten)
CCT	Creosote (Coal tar)
CWD	Creosote (Wood)
NCT	Naphtha: Coal tar solvent
OPI	Oil, misc: Pine
ORN	Oil, misc: Rosin
OTL	Oil, misc: Tall
TOF	Oil, misc: Tall, fatty acid
OTG	Oil, misc: Tung
TOB	Tall oil fatty acid, barium salt
TPT	Turpentine

**SUBSTANCES WHICH ARE NOT CONSIDERED OIL  
FOR THE PURPOSES OF THE FWPCA**

Acetone  
Alcohols  
Benzene  
1,3-Butadine  
Butane  
2-Butene-1,4-diol  
Butanol  
Butylene  
Butylene oxide  
Calcium chloride  
Caprolactam  
Caustic potash  
Caustic soda  
Cumene  
Cyclopentadiene  
Dichloroethane  
Diethanolamine  
Diethylbenzene  
Diethylenetriamine  
Diisobutylene  
Diisopropanolamine  
Dipropylene glycol  
Dodecene  
Dry oil-base paint  
Ethane  
Ethanol  
Ethyl acetate  
Ethyl chloride  
2-Ethyl hexanol  
Ethylene  
Ethylene glycol  
Ethylene oxide  
Fish gurry (unprocessed)  
Glycerine  
Hydroxethyl acrylate  
Hydroxypropyl acrylate

Isoamylene  
MAPP gas  
Magnesium hydroxide  
Methyl alcohol  
Methyl chloride  
Methyl ethyl ketone  
Methylene chloride  
Monoethanolamine  
Nonene  
Octanol  
Oleum  
Pentane  
Perchloroethylene  
Petroleum coke  
Phthalate plasticizers  
Polyethylene glycols  
Propane  
Propyl alcohol  
Propylene  
Propylene dichloride  
Propylene glycol  
Propylene oxide  
Tetraethylene glycol  
Trichlorobenzene  
Trichloroethane  
Trichloroethylene  
Triethanolamine  
Triethylene glycol  
Triethylenetetramine  
Tripropylene glycol  
Vinyl acetate  
Vinyl chloride  
Vinyltoluene  
Vinylidene chloride  
Xylene (m-, o-, p-)  
All substances designated by  
the EPA in 40 CFR 116-117