

**REVIEW OF PROCEDURES & ARRANGEMENTS MANUALS FOR UNITED STATES
VESSELS THAT TRADE INTERNATIONALLY**

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Purpose

This Plan Review Guideline (PRG) is to establish a procedure for submitting a Procedures & Arrangements (P&A) Manual to the Marine Safety Center for approval to carry Noxious Liquid Substances (NLS) onboard United States (U.S.) vessels certificated for international trade.

Contact Information

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

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1. Applicability

This PRG is applicable to P&A Manual reviews conducted for U.S. vessels that operate internationally.

2. Background

A P&A Manual outlines vessel specific procedures for the discharge of NLS for vessels engaged in international trade. In 2004, the International Maritime Organization (IMO) adopted revisions to Annex II of the International Convention for the Prevention of Pollution from Ships, as modified by the Protocol of 1978 and 1997 (MARPOL) and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code), which entered into force on January 1, 2007. U.S. vessels that carry bulk NLS must comply fully with these changes if operating on international routes. NVIC 03-06 provides additional guidance on the applicability and implementation of MARPOL and the IBC Code.

Under the MARPOL Annex II revisions, Offshore Supply Vessels (OSVs) that carry cargo internationally are required to have an approved P&A Manual. CG-ENG Policy Letter 03-12 provides additional guidance on the implementation of regulatory changes to new and existing U.S. flagged OSVs.

The MSC or an authorized Classification Society shall approve a vessel's P&A Manual prior to that vessel receiving authority to carry NLS cargo while on international trade. In the past, MARPOL gave the Flag Administration the authority to specify the format and content of the P&A Manual for vessels that only carried category D NLS cargoes and that did not have the ability to discharge NLS to the sea. In lieu of carrying P&A Manuals, vessels could have their COI endorsed to prohibit the discharge of NLS at sea. However, the 2004 revisions to MARPOL eliminated this authority and every ship certified to carry Category X, Y, or Z NLS on an international voyage is now required to maintain an approved P&A Manual.

3. References

- (a) Annex II of the International Convention for the Prevention of Pollution from Ships, as modified by the 1978 and 1997 Protocol (MARPOL)
- (b) NVIC 03-06, Guidance on Implementation of Revisions to MARPOL Annex II and the IBC Code, dated November 28, 2006
- (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 US Offshore Supply Vessels" dated May 15, 2012
- (d) International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code)

4. Definitions

- (a) Procedures and Arrangements Manual (P&A Manual): The manual required by reference (a) and U.S. regulations containing detailed information on cargo handling equipment, installed systems, and operational procedures for all NLS cargoes a vessel is permitted to carry.
- (b) Noxious Liquid Substance (NLS): Any substance indicated in the pollution category column of chapters 17 or 18 of reference (d), the most current MEPC.2 Circular, or provisionally assessed under the provisions of Regulation 6.3 of reference (a) as falling into categories X, Y, and Z. Note: this term applies to all category X, Y, and Z products in Chapter 17 or 18 of reference (d), not just those category Z products in Chapter 18 that might be carried under an NLS Certificate.

5. General Guidance

- (a) Using applicable portions of the references, the submitter shall provide a complete P&A Manual, including all attachments, for review and approval. The submission shall be made electronically to the above email address or, if paper, in triplicate to the MSC's address found on the above website.
- (b) Ensure the content and format of the P&A Manual meets the requirements listed in Appendix 4 of reference (a). The P&A Manual will be reviewed for compliance with these regulations. For OSVs, refer to reference (c) for guidance on the format and content. OSVs are required to have an approved Annex II P&A Manual even if they do not have underwater discharge ports or are not permitted to discharge NLS at sea. Sections applying to tank washing, ventilation, and stripping, as well as underwater discharge ports, will not apply to most OSVs.
- (c) 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 are listed in Regulation 12 and Addendum A of reference (a). The Officer in Charge, Marine Inspection (OCMI) shall validate NLS carriage requirements.
- (d) 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 "Approved" subject to verification by the OCMI, or if the vessel is enrolled in the Alternate Compliance Program, by the authorized Classification Society.
- (e) In those instances where a vessel owner conducts a stripping test prior to submitting the P&A Manual to the MSC (or Classification Society), the stripping test results shall be within the standards listed in Regulation 12 of reference (a) and properly documented in the submitted P&A Manual.
- (f) Vessels that, due to construction or operations, cannot discharge NLS to the sea are exempt from the stripping and discharge requirements found in reference (a). Therefore,

in accordance with Regulation 4.4 of reference (a), the vessel's COI will be endorsed to prohibit the discharge of Noxious Liquid Substances (NLS) at sea.

- (g) If the owner wishes to revise the vessel's Cargo Authority Attachment (CAA) in conjunction with the P&A Manual approval, the submission of the P&A Manual should include a request for an updated CAA. Following the P&A Manual approval, the vessel's CAA will be revised to add the authorized NLS cargoes.
- (h) For vessels that are sisters, submitting proof of sister vessel status will facilitate and potentially expedite the review. However, the MSC retains the authority to conduct a full review of any and all vessels to ensure compliance with U.S. and international regulations.

6. 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.