



# Marine Safety Information Bulletin

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## Effect of the IMO OSV Chemical Code on the Carriage of Noxious Liquid Substances in Bulk on U.S. Flagged Offshore Supply Vessels

The international carriage of noxious liquid substances in bulk is regulated by the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (the IBC Code). The International Maritime Organization (IMO) adopted the 2021 amendments (MEPC.318(74) and MSC.460(101)) to the IBC Code, set to enter into force on 1 January 2021. A table summarizing these changes is presented as Enclosure (1). With respect to offshore supply vessels (OSVs), the 2021 IBC Code amendments will be implemented through IMO resolution A.1122(30) and the updated Code for the Transport and Handling of Hazardous and Noxious Liquid Substances in Bulk of Offshore Supply Vessels (the OSV Chemical Code). The OSV Chemical Code provides the design and construction standards for an OSV to carry any of the products listed in the IBC Code. These new amendments will affect most of the carriage requirements for the products listed in ENG Policy Letter 03-12.

OSVs that intend to carry NLS on international voyages after 1 January 2021 will be required to meet the carriage requirements listed in the OSV Chemical Code or approved equivalents. Furthermore, the carriage requirements of the provisionally assessed tradename mixtures listed in the MEPC.2/Circular may change, as the IMO is currently reevaluating many of these products. For example, under the 2021 IBC Code, both methyl alcohol (methanol) and toluene will be considered toxic. Therefore, any tradename product that contains either of these two products will also likely be considered toxic. Products that must be carried on a type 2 ship will not be authorized for carriage on board a type 3 ship. OSV operators that intend to carry products listed in the IBC Code or MEPC.2/Circular in bulk on international voyages are highly encouraged to contact CG-ENG at their earliest convenience. A member of my staff will evaluate your particular circumstances and determine if any alterations to your vessel are necessary. Please contact my staff at [HQS-SMB-CG-ENG-5-HazardousMaterialDivision@uscg.mil](mailto:HQS-SMB-CG-ENG-5-HazardousMaterialDivision@uscg.mil).

OSV operators that intend to carry noxious liquid substances (NLS) on domestic routes only must meet the requirements of either 46 CFR 125.120 (for vessels less than 6,000 GT) or 46 CFR 125.125 (for vessels of at least 6,000 GT). Per ENG Policy Letter 03-12, an OSV is authorized to carry the thirty (30) products listed in Appendix I of the policy, while those vessels covered by 46 CFR 125.125 may, in addition, carry non-toxic products suitable for a type-3 ship as defined by the IBC Code. The carriage of any product requiring a type 2 ship for an OSV on a domestic route is not currently authorized.

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Enclosure (1) of MSIB 24-20 – Summary of Changes from the 2016 IBC Code to the 2021 IBC Code.

Example for how to read this table, using **acetic acid**:

The 2021 amendments to the IBC Code will alter the 2016 IBC Code carriage requirements for **acetic acid** by requiring closed gauging instead of restricted, including water spray as an option for fire suppression, deleting the special requirement in 15.19.6, and adding the special requirements of 15.17 and 15.19.

CG-ENG Policy Letter 03-12	IBC Code Product Entries – Chapter 17														
	(Note: a dash (-) indicates no change between the 2016 and 2021 IBC Code)														
Product	a	C	d	e	f	g	h	i'	i''	i'''	j	k	l	n	o
Acetic Acid	-	-	-	-	-	-	-	-	-	-	R → C	-	A → AC	-	Delete - 15.19.6 Add – 15.17; 15.19
Calcium Nitrate/Magnesium nitrite/Potassium Chloride	-	-	P → S/P	-	-	-	-	-	-	Yes → NF	-	-	A → No	-	-
Calcium Nitrate Solution (50% or less)	-	-	Add: S	Add: 3	Add: 2G	Add: Open	Add: No	-	-	Add: NF	Add: O	Add: No	Add: No	Add: No	Add – 16.2.9
Drilling Brines, including: Sodium Chloride Solution, Calcium Bromide Solution, Calcium Chloride Solution	Delete: Sodium Chloride Solution and Calcium Chloride Solution	-	P → S/P	-	-	-	-	-	-	Yes → NF	-	-	A → No	-	Add – 15.19.6
Drilling brines (containing zinc salts)	Change “salts” to “chloride”	-	P → S/P	-	-	-	-	-	-	Yes → NF	-	-	-	No → Yes	-
Ethyl Alcohol	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ethylene Glycol	-	Y → Z	P → S/P	-	-	-	-	-	-	-	-	-	A → AC	-	-
Ethylene Glycol Monoalkyl Ethers	-	-	-	-	-	-	-	-	-	-	R → C	F → FT	A → AC	-	Delete - 15.19.6 Add - 15.12.3; 15.12.4; 15.19
Formic Acid (aqueous solution)	Formic Acid (85% or less acid)	-	-	-	-	-	-	-	-	-	R → C	-	A → AC	-	Delete - 15.19.6 Add – 15.17; 15.19
Hydrochloric Acid	-	-	-	-	-	-	-	-	-	-	R → C	-	-	-	Add – 15.12; 15.17; 15.19

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Product	a	c	d	e	f	g	h	i'	i''	i'''	j	k	l	n	o
Hydrochloric-hydrofluoric mixtures containing 3% or less hydrofluoric acid	Not Listed in IBC Code	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Liquid Carbon Dioxide	Listed in IGC Code / 46 CFR 154	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Liquid Nitrogen	Listed in IGC Code / 46 CFR 154	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Methyl Alcohol	-	-	P → S/P	-	-	-	-	-	-	-	R → C	F → FT	A → AC	-	Delete – 15.19.6 Add – 15.12.1; 15.12.2; 15.12.3.2; 15.12.3.3; 15.12.4; 15.17; 15.19
Noxious Liquid, NF, (7) n.o.s. (tradename..., contains...) ST3, Cat Y	-	-	-	-	-	-	-	-	-	-	-	-	A → AC	-	-
Noxious Liquid, F, (8) n.o.s. (tradename..., contains...) ST3, Cat Y	-	-	-	-	-	-	-	-	-	-	-	-	A → AC	-	-
Noxious Liquid, NF, (9) n.o.s. (tradename..., contains...) ST3, Cat Z	-	-	-	-	-	-	-	-	-	-	-	-	A → AC	-	-
Noxious Liquid, F, (10) n.o.s. (tradename..., contains...) ST3, Cat Z	-	-	-	-	-	-	-	-	-	-	-	-	A → AC	-	Add – 15.19.6

