NAVIGATION AND VESSEL INSPECTION CIRCULAR No. 4-84

Subj: Equivalent Determination for Existing, Installed Oil-Water Separators Which Have Not Received U. S. Coast Guard Approval.

Refs: (a) 46 CFR 162.050
(b) 33 CFR 155 as modified by 48 FR 45715 dtd 6 Oct 83

1. PURPOSE. Reference (b) allows for equivalency within the intent of MARPOL 73/78 rather than replacement of existing oil-water separators with approved separators. This Circular describes how existing oil-water separators installed prior to the publishing of reference (a) may be determined equivalent to those presently approved.

2. ACTION. Determination of these oil-water separators for equivalency may consist of plan review, examination of the installed oil-water separator by a Coast Guard Marine Inspector, and/or operational testing. A ship owner who desires Coast Guard review of an unapproved oil-water separator on a U.S. flag ship, should take the following action:

   a. Submit the plans and manuals described in 46 CFR 162.050-5 to Commandant (G-MVI-3) for review. The documents forwarded will be reviewed under 46 CFR 162.050-21 to determine if the existing oil-water separator is at least as effective as that required by MARPOL 73/78.

   b. If the plans and manuals are acceptable, the oil-water separator may be examined by a Coast Guard Marine Inspector to determine that:

      (1) the oil-water separator and its associated equipment are as detailed in the accepted plans and manuals;

      (2) the oil-water separator and its associated equipment are installed in accordance with Coast Guard regulation and good marine practice,

      (3) The Pitch And Roll Test. In order to show that the oil-water separator can continue to operate at pitch and roll through both axes of up to 22.50, the ship owner may submit an analysis to Commandant (G-b(VI-3) by a registered professional engineer.
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