# MARINE SAFETY INFORMATION BULLETIN

Volume XX Issue: 005

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## Hydrostatic Testing of Bunker Lines

Sector New Orleans Port-State Control Officers (PSGOs) are discovering numerous vessels that are not in compliance with the requirements of 33 Code of Federal Regulations (CFR) 156.170, which requires each transfer pipe system on board a vessel to be tested under static liquid pressure at least 1.5 times the maximum allowable working pressure annually. Several vessels could not provide the written records of the date and result of the most recent hydrostatic test and inspection of the vessel's bunker lines/transfer systems as required.

It is the responsibility of the master and/or operator of a vessel to ensure that the vessel is in compliance with 33 CFR parts 155 (Oil or Hazardous Material Pollution Prevention Regulations) and 156 (Oil and Hazardous Material Transfer Operations) prior to the vessel engaging in the transfer of oil or hazardous material on the navigable waters or contiguous zone of the United States.

The Coast Guard recognizes that achieving test pressures of 150% MAWP for annual bunkering and/or cargo piping tests on vessels is often impractical while vessels are in service or outside of shipyards where special equipment may not be available. Therefore, the Coast Guard will continue to accept alternatives as described below:

33 CFR 156.107, Alternatives, states that the Captain of the Port may consider and approve alternative procedures, methods, or equipment standards to be used by a vessel operator in lieu of any requirements in 33 CFR 156 if:

- 1. Compliance with the requirement is economically or physically impractical
- 2. The vessel operator submits a written request for the alternative at least 30 days before operations under the alternative are proposed, unless the Captain of the Port authorizes a shorter time.
- 3. The alternative provides an equivalent level of safety and protection from pollution by oil or hazardous material, which is documented in the request.

The U. S. Coast Guard Marine Safety Manual allows for acceptance of alternative test pressures of not less than 100% MAWP for annual bunker and/or cargo piping tests, provided that a 150% MAWP test of the piping is conducted at least twice in any five year period. It is envisioned that the 150% MAWP tests will be conducted during drydock periods at the discretion of the vessel owners or operators. To use this nationally accepted alternative a request is not required to be submitted to Sector New Orleans. For other alternatives, a request for alternative testing must be submitted as described above.

Acceptance of Alternative Cargo Piping Test Pressures for Vessels, USCG Marine Safety Manual Volume II, Section B, Chapter 6, pages 27-29, available at: https://media.defense.gov/2017/Mar/29/2001723817/-1/-1/0/CIM\_16000\_7B.PDF

#### UNITED STATES COAST GUARD SECTOR NEW ORLEANS

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The annual test (for tightness) at 100% MAWP referenced above comes from: 46 CFR Part 35, section 35.70 https://www.ecfr.gov/cgi-bin/text-idx?SID=258f06e6d213fbf93157dcc05012aead&mc=true&node=se46.1.35\_135\_670&rgn=div8

Should you have any questions, please contact the US Coast Guard Sector New Orleans Port State Control Branch at (504) 365-2361 or via email at <u>pscnola@uscg.mil</u>.

For further information, contact:

Coast Guard Port State Control: (504) 365-2361 or 2362 Coast Guard Sector New Orleans Command Center: (504) 365-2544 or 2209

Time:

M.M. Juk

CAPTAIN K. M. LUTTRELL Captain of the Port New Orleans

For a current list of MSIBs in the COTP New Orleans Zone visit: https://homeport.uscg.mil/port-directory/new-orleans under "Safety Notifications"