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**Marine Inspection Office Europe**



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**MARINE SAFETY INFORMATION BULLETIN (MSIB) 01-07**

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**Implementation of Revisions to MARPOL Annex II and the IBC code**

During a recent inspection of a U.S. flagged tank ship traveling on an international voyage, we found the vessel had not yet begun to implement the revisions of MARPOL Annex II of the International Convention for the Pollution from Ships, 1973, as amended by the Protocol of 1978 relating thereto (MARPOL), and the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code). The revisions entered into force on January 1<sup>st</sup>, 2007

This is a very serious matter that requires immediate attention. Every company operating a ship effected by the revisions to MARPOL Annex II and the IBC Code must be in compliance with these new requirements.

The revisions significantly changed the requirements for ships carrying NLS in bulk. In brief, every bulk liquid cargo that is not regulated as oil under Annex I has been reclassified and assigned a new pollution category. As a result, many cargoes that were once authorized for carriage on product carriers must now be carried on chemical tankers. Some cargoes also have more stringent ship type or additional carriage requirements. The minimum requirements for carriage of NLS cargoes can be found in Chapter 17 of the revised IBC Code and 46 CFR Part 153, Table 1.

A link has been added at <http://www.uscg.mil/acteur/> to answer most of the questions pertaining to the implementation of MARPOL Annex II. This link covers many critical aspects of the new MARPOL requirements, as well as a list of chemicals that have changed and are now NLS's and require a higher cargo authority. This list is also included as enclosure (1) to this MSIB.

Navigation and vessel inspection circular (NVIC) 03-06 provides guidance regarding the implementation of the revisions to Annex II of MARPOL and the IBC Code. This information is available at: <http://www.uscg.mil/hq/g-m/nvic/index00.htm#2006>.

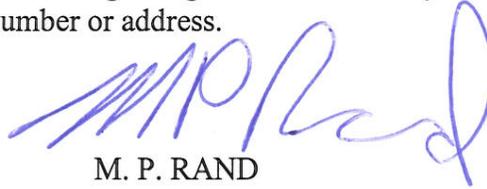
Visit us on the World Wide Web at [www.uscg.mil/acteur/](http://www.uscg.mil/acteur/)

Vessels carrying NLS that have not fully implemented MARPOL Annex II have four options:

1. Surrender international certificates and have the COI endorsed to limit the routes to the waters under the jurisdiction of the US. The Cargo Authority Attachment (CAA) will remain valid.
2. Revise and resubmit the Procedures and Arrangements Manual (P&A) to the Marine Safety Center (MSC). If the vessel is going to be certified under 46 CFR Subchapter O, the vessel will have to submit a completed Tank Group Characteristics Loading Form (TGCLF) specific to MARPOL Annex II. The Marine Safety Center (MSC) will generate a new cargo list the vessel.
3. The vessel can remove all NLS cargoes from its cargo authority. This can best be accomplished by a written request to MSC. Then MSC will determine what the vessel can and can't carry and generate a new CAA as appropriate.
4. The vessel can apply for and receive an exemption from Commandant (CG-3PSO-3) per NVIC 03-06. Coast Guard Headquarters will make a decision, and MSC will provide a new CAA and/or COI endorsements as appropriate.

Vessel owners/operators that have failed to comply but continue to operate may be subject to civil penalty action and/or operating restrictions.

For additional information or clarification regarding this Marine Safety Bulletin, please contact Lieutenant Ted Harre at the above number or address.



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Enclosure (1) Cargo changes under MARPOL Annex II

## Cargo changes under MARPOL Annex II

Cargoes that may not be carried on Product Carriers (Subchapter D) after January 01 2007

IMO Cargo Name	CHEM CODE	Old PC	New PC
Aviation alkylates (C8 paraffins and iso-paraffins BPT 95 - 120°C)	AVA	C*	X
Cycloheptane	CYE	C*	X
Heptane (all isomers)	HMX	C*	X
Nonane (all isomers)	NAX	C*	X
Octane (all isomers)	OAX	C*	X
Cyclohexane	CHX	C*	Y
p-Cymene	CMP	C*	Y
Cyclopentane	CYP	C*	Y
Ethylcyclohexane	ECY	C*	Y
Hexene (all isomers)	HEX	C*	Y
Heptene (all isomers)	HPX	C*	Y
Hexane (all isomers)	HXS	C*	Y
Isopropylcyclohexane	IPX	C*	Y
Methylcyclohexane	MCY	C*	Y
Olefin mixtures (C5-C7)	OFX	C*	Y
Pentene (all isomers)	PTX	C*	Y
Pentane (all isomers)	PTY	C*	Y
1-Phenyl-1-xylyl ethane	PXE	C*	Y
Tetrahydronaphthalene	THN	C*	Y
Toluene	TOL	C*	Y
Xylenes	XLX	C*	Y
Alkenyl (C1 1+) amide	AKM	D	X
Myrcene	MRE	D	X
Alkyl ester copolymer (C4-C20)	AES	D	Y
Acrylonitrile-Styrene copolymer dispersion in polyether polyol	ALE	D	Y
Cyclohexanol	CHN	D	Y
Decahydronaphthalene	DHN	D	Y
Ethylenediaminetetraacetic acid, tetrasodium salt solution	EDS	D	Y
Ethylene glycol	EGL	D	Y
N-(Hydroxyethyl) ethylenediaminetriacetic acid, trisodium salt solution	HET	D	Y
Hexanol	HXN	D	Y
Methyl alcohol	MAL	D	Y
Castor oil	OCA	D	Y
Coconut oil	OCC	D	Y
Coconut oil fatty acid methyl ester	OCM	D	Y
Corn Oil	OCO	D	Y
Cotton seed oil	OCS	D	Y
Fish oil	OFS	D	Y
Groundnut oil	OGN	D	Y
Linseed oil	OLS	D	Y
Olive oil	OOL	D	Y
Palm oil	OPM	D	Y
Palm kernel oil	OPO	D	Y

Cargoes that may not be carried on Product Carriers (Subchapter D) after January 01 2007

IMO Cargo Name	CHEM CODE	Old PC	New PC
Rice bran oil	ORB	D	Y
Rapeseed oil	ORP	D	Y
Soyabean oil	OSB	D	Y
Safflower oil	OSF	D	Y
Sunflower seed oil	OSN	D	Y
Tung oil	OTG	D	Y
Palm oil fatty acid methyl ester	PNF	D	Y
Tallow fatty acid	TFD	D	Y
Tallow	TLO	D	Y
Alkenyl (C16-C20) succinic anhydride	AAH	D	Z
n-Amyl alcohol	AAI	D	Z
Alkyldithiothiadiazole (C6-C24)	ADT	D	Z
Iso- and cyclo-alkanes (C10-C11)	AKI	D	Z
Alkyl (C8-C40) phenol sulphide	AKS	D	Z
Ammonium sulphate solution	AME	D	Z
Ammonium hydrogen phosphate Solution	AMI	D	Z
Isobutyl formate	BFI	D	Z
Butylene glycol	BUG	D	Z
epsilon-Caprolactam (molten or aqueous solutions)	CLS	D	Z
Calcium hydroxide slurry	COH	D	Z
Ethyl acetate ETA D Z			
Hexamethylenediamine adipate (50% in water)	HAM	D	Z
n-Heptanoic acid	HEP	D	Z
Methyl tert-butyl ether	MBE	D	Z
Methyl isobutyl ketone	MIK	D	Z
Poly(2-8)alkylene glycol monoalkyl(C1-C6) ether	PAG	D	Z
Sodium benzoate	SBN	D	Z
Sodium carbonate solution	SCE	D	Z
Sulphonated polyacrylate solution	SPA	D	Z
Urea/Ammonium nitrate solution (containing less than 1% free ammonia)	UAT	D	Z
Diethyl phthalate	DOP	III	X
Alkyl sulphonic acid ester of phenol	AKH	III	Y
Alcohols (C13+)	ALY	III	Y
Benzenetricarboxylic acid, trioctyl ester	BCE	III	Y
Dihexyl phthalate	DHL	III	Y
Diheptyl phthalate	DHP	III	Y
Diisooctyl phthalate	DIO	III	Y
Ditridecyl adipate	DTY	III	Y
Dodecyl Xylene	DXY	III	Y
Fatty acid (saturated C13+)	FAD	III	Y
1-Hexadecylnaphthalene / 1,4-bis(hexadecyl)naphthalene mixture	HNH	III	Y
Long-chain alkylphenate/Phenol sulphide mixture	LPS	III	Y
Lard	LRD	III	Y

Cargoes that may not be carried on Product Carriers (Subchapter D) after January 01 2007

IMO Cargo Name	CHEM CODE	Old PC	New PC
Octyl decyl adipate	ODA	III	Y
Olefins (C13+, all isomers)	OFZ	III	Y
n-propyl alcohol	PAL	III	Y
Poly(4+)isobutylene	PIL	III	Y
Polybutene	PLB	III	Y
Poly(5+)propylene	PLP	III	Y
Polyolefin (molecular weight 300+)	PMW	III	Y
Poly(20)oxyethylene sorbitan Monooleate	PSM	III	Y
Polysiloxane	PSX	III	Y
Petrolatum	PTL	III	Y
Paraffin wax	WPF	III	Y
Zinc alkenyl carboxamide	ZAA	III	Y
tert-Amyl alcohol	AAL	III	Z
Alkyl(C9+)benzenes	AKB	III	Z
Iso- and cyclo-alkanes (C12+)	AKJ	III	Z
n-Alkanes (C10+)	ALJ	III	Z
Alkyl (C9-C15) phenyl propoxylate	AXL	III	Z
Isobutyl alcohol	BAY	III	Z
Dodecylbenzene	DDB	III	Z
Diethylene glycol diethyl ether	DGS	III	Z
Dipropylene glycol	DPG	III	Z
Glyceryl triacetate	GCT	III	Z
Hexamethylene glycol	HMG	III	Z
Isopropyl acetate	IAC	III	Z
Latex: Carboxylated styrene-Butadiene copolymer; Styrene-Butadiene rubber	LCC	III	Z
2-Methyl-1,3-propanediol	MDL	III	Z
Methyl ethyl ketone	MEK	III	Z
Methyl acetate	MTT	III	Z
3 -Methyl-3 -methoxybutanol	MXB	III	Z
Polyisobutenyl anhydride adduct	PBA	III	Z
Polyethylene glycol dimethyl ether	PEE	III	Z
Polyethylene glycol	PEG	III	Z
Tridecyl acetate	TAE	III	Z
Tripropylene glycol	TGC	III	Z
Triisopropanolamine	TIP	III	Z
2,2,4-Trimethyl-1,3-pentanediol			
Diisobutyrate	TMQ	III	Z
Tetraethylene glycol	TTG	III	Z