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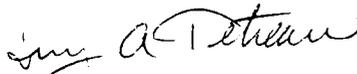
5 November 1998

From: Commander, Eighth Coast Guard District  
To: Distribution

Subj: CARGO PIPING HYDROSTATIC TEST INTERVALS

Ref: (a) CCGD8 (mvs) distribution ltr 16455 of 24 August 1988  
(b) 33 CFR 156.170 (f)

1. In response to a request for a status update on Eighth District policy concerning alternative testing arrangements for cargo piping hydrostatic testing as outlined in reference (a), it has been determined that reference (a) is no longer applicable and is hereby canceled.
2. On 24 August 1988, Commandant approved alternative testing arrangements under the provisions of 33 CFR 156.110 and allowed cargo piping hydrostatic testing to be conducted at least twice in any five year period vice the annual requirement stated in reference (b). This was done in anticipation that the regulations would change to reflect Commandant's decision on an appeal. However, the changes to 33 CFR 156.170 never materialized and after the revision of 33 CFR 156 on 21 June and 4 September 1990, it continued to require these tests to be performed annually or as part of the biennial and mid period inspections.
3. The "twice in five year" test interval is too infrequent to readily detect and correct conditions before a spill occurs.
4. All cargo piping on vessels shall be tested annually at 150% MAWP as presently required in 33 CFR 156.170 or otherwise approved by this office. In the past, Commandant has approved non-destructive testing as an alternate test procedure in lieu of the annual hydrostatic test as recommended by industry standards (API 570). OCMIs are encouraged to notify affected companies of this policy cancellation.
5. Questions regarding this matter may be referred to LT Frank Rego at (504) 589-6271.

  
G. A. TETREAU  
By direction

Dist: All Eighth District MSOs, MSDs and MSU

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