

**DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD**

U.S. Coast Guard (G-MVI-3)
Washington, DC 20593
(202) 426-1444


NVIC 9-82
10 May 1982

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 9-82

Subj: MSD Certification

1. **PURPOSE.** This Circular is intended to provide information to the marine industry concerning MSD requirements and certification procedures. It is also intended to advise the Marine Industry that multiple certification of MSDs can and should be obtained depending upon the service of the vessel.
2. **BACKGROUND.** At the present time, any vessel with an installed toilet operating in the navigable waters of the United States is required to have a USCG certified Marine Sanitation Device (MSD). This requirement applies to both foreign and U.S. vessels, and is codified as 33 CFR 159. Annex IV to the 1973 International Convention for the Prevention of Pollution from Ships (MARPOL 73) establishes regulations for the Prevention of Pollution by Sewage from Ships. During the VIth Session, The Marine Environmental Protection Committee of IMCO adopted Resolution MEPC.2 (VI) which contains MSD Standards and invites member governments to use the Standards when approving MSDs. The United States has not ratified Annex IV of MARPOL 73 and at the time of this writing, does not anticipate ratifying Annex IV. Some countries and certain ports, however, require MSDs approved as meeting IMCO Standards prior to allowing entry. Canada has also published separate MSD Standards and Regulations for the Great Lakes in the Regulations Respecting Prevention of Pollution of the Great Lakes Waters by Sewage from Ships. These Regulations apply to all commercial vessels, both foreign and Canadian, operating in the Canadian waters of the Great Lakes and the St. Lawrence River. There is a letter of understanding, however, which allows U.S. vessels to operate in Canadian waters of the Great Lakes with USCG Certified MSDs and allows Canadian vessels to operate in U.S. waters of the Great Lakes with Canadian certification.
3. **DISCUSSION.** The Regulations cited above contain some differences in both effluent standards and certification procedures. Of particular note are the differences in effluent quality. A summary of these standards is listed as Enclosure (1). Because of these differences, obtaining one type of certification does not necessarily ensure the MSD complies with all sets of regulations. This leads to a confusing and sometimes frustrating situation. Therefore, in the interest of enhancing maritime commerce, the actions indicated below should be implemented.
4. **ACTION.**
 - a. Vessel owners and operators should anticipate the intended usage of their vessels and should determine which certifications are required.
 - b. MSD manufacturers are encouraged to seek as much multiple certification as their market demands as this may save them money in the long run.

- c. Recognized laboratories should encourage manufacturers to pursue -multiple certification as often as possible. The procedures to follow for certification under the various standards can be obtained from Commandant (G-MVI-3/24) upon request.
- d. Laboratories should submit the information required by both USCG Certification Procedures and IMCO Type Testing, as specified in Resolution MEPC.2(VI), to Commandant (G-MVI-3I24). Any device which is tested and meets the IMCO Standards specified in Resolution MEPC.2(VI), in addition to meeting the U.S. Standards specified in 33 CFR 159 will receive USCG Certification and a "Certificate of Type Test" stating that the device has been tested and meets the requirements of Resolution MEPC.2(VI). This Resolution (MEPC.2(VI)) invites member governments to recognize the "Certificate of Type Test" as their own.
- e. All Coast Guard personnel should promote and encourage MSD manufacturers to pursue multiple certification of MSDs.


CLYDE J. LUSK, JR.
 Chief, Office of Merchant Marine Safety

End (1) MSD Effluent Standards Table

NON-STANDARD DISTRIBUTION:

Ce: Baltimore (75); San Francisco, Mobile, Pittsburgh, Providence, Boston Norfolk (50); Galveston (30); Cleveland, Portland OR, Sturgeon Bay (25); San Diego, Savannah, Buffalo, Corpus Christi (20); Tampa, Valdez, Milwaukee, Louisville, Detroit, Toledo, Nashville, Anchorage (15); Portland ME, Duluth, Charleston, Huntington, Minneapolis, St. Paul (Dubuque), San Juan, Miami (10); Juneau, Cincinnati, Memphis, Wilmington, Paducah, (5) extra

Cm: New Orleans (250); New York (200); Seattle (100); Houston (50); Terminal Is (IA-LB), Philadelphia (40) extra

Em: New London, Houma (30); Ludington (8) extra

En: Ketchikan, Kenai, Kodiak, Lake Charles (5) extra
 List CG-12; ZTC-68

MSD EFFLUENT STANDARDS TABLE

Upper Limit Values For	USCG Type I*	USCG Type II	Canada Great Lakes **	IMCO When Tested
Suspended Solids	None Visible	150mg/l	50mg/l	In Lab On VSL 50mg/l 100mg/l
Faecal Coliform	1000/100ml	200/100ml	200/100ml	250/100ml
B.O.D.5	Not Spec.	Not Spec.	50mg/l	50mg/l
Residual Chlorine	Not Spec.	Not Spec.	0.5-1.0mg/l***	To degree practicable

- * Type I units may only be installed on vessels less than 65ft in length.
 ** Effective February 1982
 *** Use of chlorine as a disinfectant is discouraged by Environment Canada.
 **** 5-Day biochemical oxygen demand

U.S. Department
of Transportation

Commandant (G-MVI-3)
United States Coast Guard

Washington, DC 20593-0001
202-267-1444

**United States
Coast Guard**


COMDTPUB P16700.4
NVIC 9-82 , CH-1
8 Oct 1988

NAVIGATION AND VESSEL INSPECTION CIRCULAR NO. 9-82, CHANGE 1

Subj: Change 1 to NVIC 9-82 of 10 May 1982, Subj: MSD Certification

1. **PURPOSE.** This Circular revises guidance in Navigation and Vessel Inspection Circular No. 9-82, by providing for acceptance of non-Coast Guard certified sewage treatment plants on foreign flag vessels operating in waters of the United States, if the sewage treatment plants meet the requirements of Annex IV of the International Convention for the Prevention of Pollution from Ships, 1973 (MARPOL). The performance requirements for Annex IV Sewage treatment plants are in Resolution MEPC.2(VI) of the International Maritime Organization (IMO).
2. **BACKGROUND.** Although it is not in force internationally and has not been ratified by the United States, several countries have ratified MARPOL Annex IV (Regulations for the Prevention of Pollution by Sewage from Ships). Some foreign shipping administrations have already begun to issue MARPOL Annex IV Certificates of Type Test for sewage treatment plants. For foreign flag ships, the United States has typically recognized appropriate foreign certifications for ship safety equipment based on international instruments. Under 33 U.S.C. 1322(c)(2) and (g)(1), there is no requirement for the United States to maintain a certification procedure for foreign flag ships as long as there is another means for verifying the acceptability of their sewage treatment plants.
3. **DISCUSSION.**
 - a. Enclosure (1) to NVIC 9-82 contains a comparison of effluent standards for USCG certified Type I and Type II Marine Sanitation Devices (MSDs), Canadian certified MSDs meeting Great Lakes standards, and MARPOL Annex IV sewage treatment plants (identified as "IMCO" on the table). The MARPOL standard for suspended solids is more stringent than the U.S. standard, and the fecal coliform count standard is marginally less stringent. The MARPOL sewage treatment plants must also meet a standard for 5-day biological oxygen demand (BOD₅) for which there is no U.S. equivalent.
 - b. NVIC 9-82 notes that a letter of understanding allows U.S. vessels to operate in the Canadian waters of the Great Lakes with USCG certified MSDs and allows Canadian vessels to operate in U.S. waters of the Great Lakes with Canadian certification.
 - c. The Coast Guard has determined (and the Environmental Protection Administration concurs) that sewage treatment plants meeting MARPOL Annex IV are fully equivalent to Coast Guard certified Type II MSDs. The appropriate evidence for compliance with MARPOL Annex IV is a "Certificate of Type Test" indicating testing in accordance with the requirements of IMO Resolution MEPC.2(VI). The Certificate of Type Test must be issued by or on behalf of a government which is a party to the MARPOL Convention.
4. **IMPLEMENTATION.**

- a. A foreign flag vessel that has a "Certificate of Type Test" indicating that its sewage treatment plant meets the test requirements of Resolution MEPC.2(VI) of the International Maritime Organization will be accepted by the Coast Guard as being in compliance with 33 CFR 159.7(b) or (c). Such a plant will be considered as fully equivalent to a Coast Guard certified Type II MSD as long as the unit is in operable condition.
- b. U.S. registered vessels will continue to be required to have Coast Guard certified MSDs in accordance with 33 CFR 159.



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 Acting Chief, Office of Marine Safety,
 Security, and Environmental Protection

Non-Standard Distribution:

- C:e New Orleans (90); Baltimore (45); San Francisco (40); Philadelphia, Port Arthur, Honolulu, Puget Sound (35); Miami, Mobile, Long Beach, Morgan City (25); Hampton Roads, Jacksonville, Portland OR (20); Boston, Portland ME, Charleston, Anchorage, (15); Cleveland (12), Louisville, Memphis, Paducah, Pittsburgh, St. Louis, Savannah, San Juan, Tampa, Galveston, Buffalo, Chicago, Detroit, Duluth, Milwaukee, San Diego, Juneau, Guam, Valdez (10); Providence, Huntington, Wilmington, Corpus Christi, Toledo (5).
- C:m New York (70); Houston (25); St. Ignace (5); Sturgeon Bay (4).
- D:l CG Liaison Officer MILSEALIFTCOMD (Code M-4E4), CG Liaison Officer RSPA (DHM-22), CG Liaison Officer MARAD (MAR-720.1), CG Liaison Officer JUSMAGPHIL (1).