

**DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD**

U.S. Coast Guard (G-MVI-3)
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NVIC 4-84
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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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