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US Coast Guard Requirements for Hydrostatic Testing of Bunker Lines

July 2008

The US Coast Guard Captain of the Port (COTP) in New Orleans has recently issued a warning to vessels concerning compliance with 33 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. During Port State Control (PSC) examinations, the COTP has noted that approximately 30% of vessels are not in compliance. In most cases, the PSC Officers found that the vessels had tested the systems with air rather than with liquid which makes the test null and void. In addition, several vessels were not able to provide written records of the date and result of the most recent test and inspection of bunker lines/transfer systems as required by 33 CFR 155.820.

The Coast Guard has not yet begun to issue fines or penalties for non-compliance. However, vessels do run the risk of having their bunkering operations stopped until the proper tests are conducted.

Owners and operators reminded that vessels must be in compliance with these regulations (33 CFR parts 155 and 156) prior to engaging in the transfer of oil or hazardous material in the US. As stated above, bunker lines are required to be tested to 1.5 times their allowable operating pressure by placing them under a constant hydrostatic load for a prescribed period of time (usually 5-10 minutes is sufficient). This is best achieved by using the FO transfer pump (s) to fill bunker lines up to the manifolds (with fuel oil), purge the lines via manifold valves, then build pressure in the lines until 1.5 times the normal operating pressure is reached (operating parameters should be available in the bunker plan, or the vessel may be guided by pipeline material pressure ratings).

If the FO transfer pump is a positive-displacement type, it may be stopped when the required test pressure is reached as it should not permit backflow. If a centrifugal type of pump is employed, constant running will be required to ensure the necessary pressure is maintained during the test. In addition to log entries in Deck Logbook and Oil Record Book (ORB), the deck bunker lines are also required to be stenciled with the date of last pressure test together with the pressure maintained (in kg/cm², psi or bar).

Based on ECM Maritime Client Alert 18 of 18 July 2008.